

Volume III

Response to Comments

Certified Final

PROGRAM ENVIRONMENTAL IMPACT REPORT
For the *Plan Santa Barbara* General Plan Update

SCH # 2009011031



City of Santa Barbara
Community Development Department
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Santa Barbara, California 93101

Prepared by:
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September 2010





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RESPONSE TO COMMENTS ON DRAFT EIR

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INTRODUCTION

RESPONSE TO COMMENTS ON DRAFT EIR

Copies of all written comments received during the public review period, as well as summaries of the April 28-29, May 6, and June 3, 2010 Planning Commission hearings on the Draft EIR held during the public review period, are provided in this section.

Responses to these comments have been prepared to address the environmental concerns raised by the commenter and to indicate where and how the EIR addresses relevant environmental issues. Responses to comments are keyed to the written comment using an abbreviation for the commenting agency or individual. Comments specifically addressing the City's General Plan Update have been identified "**(Plan SB GPU).**"

AGENCY LETTERS

A1, California Department of Fish and Game (May 17, 2010)

Response to Agency Letter # A1, California Department of Fish and Game (May 17, 2010)

A1-1: Comment noted. The EIR notes the State Department of Fish and Game's role as a Trustee Agency for biological resources.

A1-2: Comment noted. Both the draft Santa Barbara General Plan Update policies and the required and recommended EIR mitigation measures include measures to improve coordination of habitat and wildlife protection, conserve important large unfragmented habitats and protect associated wildlife, protect aquatic systems, and restore degraded areas.

A1-3: Comment noted. The City Master Environmental Assessment (MEA) maps were compiled based on review of all available existing studies, aerial photo interpretation, input from local biologists, and limited field verification. Existing, ongoing City procedures for evaluation of individual development proposals use the MEA maps as an initial tool together with site visits and other available information to determine the need for site-specific biological surveys as part of CEQA review. Pre-development habitat surveys are conducted as needed prior to development of undisturbed habitats. In addition, MM BIO-1 (Upland Habitat and Species Protection, EIR section 7.8) requires protection of non-native grasslands larger than five acres and native grasslands of 0.025 acres or larger. However, this measure has been amended to add: Habitat surveys of such larger contiguous habitats shall be conducted as necessary prior to consideration of development or disturbance of such habitats.

A1-4: Comment noted. Table 7.2 (EIR section 7.1.2) already lists both the California red-legged frog and southwestern pond turtle and notes potential occurrences.

A1-5: Comment noted. Table 7.2 (EIR section 7.1.2) has been revised to note the status of the California Brown Pelican and the potential for more widespread occurrence of the California red-legged frog and southwestern pond turtle.

A1-6: Comment noted. Please see revised text in EIR section 7.2 in response.

A1-7: Comment noted. The figure in the text for estimated grassland acreage within the City is correct, when taking into account those small areas of grassland that occur in creeks and wetlands, and in the coastal zone. The grassland acreages that the DFG refers to in Section 7.1.1.1 are limited to only those in upland habitats. Please refer to response A1-3 regarding information used in habitat mapping. Annual grasslands on the South Coast of Santa Barbara County are typically dominated by non-native species, with the notable exception of the Ellwood Mesa, San Marcos Foothills, portions of Gaviota State Park, and smaller areas such as the portreros along Arroyo Burro Creek (refer to Figure 7.1).

A1-8: Comment noted. Existing City policy strongly discourages channelization of creeks and draft Santa Barbara General Plan Policies ER16–Creek Resources and Water Quality (*previously numbered ER24-28 during DEIR*) and ER18–Creek Setbacks and Restoration (*previously ER27*) further promote protection and restoration of creeks. In addition, MM BIO-2 (Creek, Riparian Habitat and Species Protection) in the EIR sets forth required measures regarding creek protection and channelization. However, the potential for flood control efforts to affect creek habitats has been noted; please see revised text in EIR section 7.5.

A1-9: Comment noted. Please see revised text in MM BIO-1.b (Wildlife Corridor Protection Policy) in EIR section 7.8.

A1, California Department of Fish and Game (Continued)

A1-10: Comment noted. However, proposed mitigation measure BIO-2 (Creeks, Riparian Habitats and Species Protection) is worded as a goal with 0.5 miles as a *minimum*. The City may go beyond this level of effort. The measures also need to consider feasibility, given the costs and difficulty of restoring urban area creeks; a goal of 0.5 miles appears to constitute a feasible minimum goal.

A1-11: Comment noted. Please see response A1-8 above.

A1-12: Comment noted. Please see revised text in EIR section 11.9, RM HYDRO-1 (Flood Hazards) with expanded examples of bioengineering methods.

**# A2, California State Parks/Santa Barbara Trust for Historic Preservation
(May 5, 2010)**

Response to Agency Letter # A2, California State Parks/Santa Barbara Trust for Historic Preservation (May 5, 2010)

A2-1 (Plan SB GPU): Thank you for your comments. The City appreciates the concerns of California State Parks and the Santa Barbara Trust for Historic Preservation regarding the need for protection of El Presidio State Historic Park, El Pueblo Viejo, and associated historic resources. Existing historic protection policies of the City within the Charter, General Plan Conservation Element, Ordinances, and Guidelines and the project permitting, design review, and environmental review processes will continue. Nothing in the draft Santa Barbara General Plan Update (GPU) or the EIR suggest or direct that the City retreat from its long-standing commitment to protect historic resources. Rather, the City is seeking with the GPU to refine and strengthen its approach to historic resource preservation while accommodating compatible in-fill development, as embodied in land use sustainability principles. This approach is consistent with State mandates such as those contained in SB 375 to diversify mobility options, strive for a balance between jobs and housing, and thereby reduce commuting, energy demand, generation of greenhouse gases (GHGs), and associated contributions to global climate change.

The draft Santa Barbara General Plan and the EIR provide substantial background on and analysis of the importance of the City's historic resources, particularly those in El Pueblo Viejo, as well as multiple policies to protect these resources. For example, Land Use Element Policy LG13-Community Character (*previously numbered CH8-10, CH 14 during DEIR*) requires that size, bulk, and scale standards be strengthened to "ensure compatibility with surrounding uses, particularly historic resources..." while Policy LG14-Historic Structures (*previously CH10*) specifically requires protection of "historic structures through building height limits and other development standards in Downtown." Historic Resources Element Policy HR3 (Development Adjoining Designated Historic Structures) requires that "developments on parcels adjoining designated historical structures be designed, sited and scaled to be compatible with their historic neighbor and public enjoyment of the historic site."

The City believes that careful implementation of land use sustainability principles, in concert with the historic resource protection policies outlined above and the City's existing comprehensive design review process and historic resource protection standards can result in an appropriate balance between new sustainable development and conservation of historic resources. The City is committed to working with California State Parks and the Trust and other community groups to identify and implement an appropriate balance between these issues. However, it is premature at this time to identify the historic Downtown core and the block surrounding El Presidio as a complete "non-MODA zone." Rather, existing and proposed standards would be vigorously applied to ensure protection of historic resources in this area pending development of a full Historic Resources Element and other policy implementation measures. In addition, please see proposed additions to LG14 regarding buffers around historic structures, and to Historic Resources Element policy HR5 regarding establishment of historic districts.

A2-2 (Plan SB GPU): Comment noted. The Land Use Map in the Land Use Element of the draft Santa Barbara General Plan Update depicts El Presidio as a park. See also text additions to the Land Use Element Downtown Neighborhood Description.

A2-3 (Plan SB GPU): Comment noted. The presence of El Presidio de Santa Barbara State Historic Park within the Downtown, its management and importance are described in the Downtown Neighborhood Description in the Land Use Element of the draft Santa Barbara General Plan Update. Discussion of El Presidio and associated historic structures is included in section 10.1.3 of the DEIR with a photograph of the

A2, California State Parks/Santa Barbara Trust for Historic Preservation (Continued)

Presidio on page 10-1. Although the size and population of El Presidio de Santa Barbara State Historic Park do not support its identification as a separate stand-alone neighborhood, additional language has been added to Section 10 of the EIR describing the importance of this park which is now also depicted on Figure 10.1 of the EIR.

A2-4 (Plan SB GPU): Comment noted. The Land Use map in the Land Use Element of the draft Santa Barbara General Plan Update has been updated to more accurately reflect the boundaries of El Presidio de Santa Barbara State Historic Park. At the State's request, the "bubbles" depicting potentially developable sites located on State owned property in El Presidio have been removed from the Housing Element Inventory sites map in Appendix F.

A2-5: Comment noted. Please see the revised Relevant Plans and Regulations discussion in the EIR section 10.2.

A2-6: Comment noted. The EIR provides detailed discussion of the City's historic and design districts and describes potential impacts of new development within El Pueblo Viejo. The EIR analysis accounts for policies LG13, LG14, and HR3 and HR5, which require protection of historic buildings/districts, and provides two additional mitigation measures to further reduce potential impacts to these resources: MM HER-1a (Construction Adjacent to Historic Structures) and -1b (Protection of Landmark and Historic Districts). The letter recommends changes to MM HER-1b, but does not provide facts or analysis as to why such impacts would remain significant after application of proposed General Plan policies and required EIR mitigation measures.

Existing City policies, ordinances, and development review procedures provide for a high level of review of proposed development with the El Pueblo Viejo Design District. The policies within the draft Santa Barbara General Plan Update and the EIR mitigation measures would further strengthen such protections. These measures and those proposed to reduce the density and impact of new structures with the most historic areas of the City and adjacent to landmarks and other historic buildings would ensure that affects of new development would be fully mitigated. The City would coordinate with California State Parks and the Trust to ensure that their concerns are considered during any upcoming implementing ordinance changes and review of future development projects. In addition, please see refinements to the draft Land Use Element and Historic Resources policies to further address buffering of historic resources, and establishment of historic districts.

A2-7: Comment noted. EIR Figures 3.2 (draft Land Use map), 10.1 (Historic Districts), and 14.1 (Public Services) have been updated to reflect the location and extent of El Presidio State Historic Park.

A2-8 (Plan SB GPU): Thank you for your comments. The City recognizes the high cultural and economic value of the historic nature of its Downtown Core. Existing and proposed City plans and policies recognize and protect the value of the City's historic resources, especially those within the Downtown core. The City looks forward to working with California State Parks, the Trust and interested citizens to balance protection of these with reasonable levels of infill development needed to meet City needs, State Housing Element mandates, and assist in meeting the State goals of SB 375 and AB 32.

**# A3, California State Parks/Santa Barbara Trust for Historic Preservation
(May 13, 2010)**

Response to Agency Letter # A3, California State Parks/Santa Barbara Trust for Historic Preservation (May 13, 2010)

A3-1 (Plan SB GPU): Thank you for your comments. The City's existing plans, policies, and ordinances, as well as those provided in the March 2010 draft Santa Barbara General Plan and new policy language for historic resource buffers all recognize the importance of and provide protection to the historic and aesthetic resources within El Pueblo Viejo. The EIR also addresses this issue and provides impacts analysis and mitigation measures to further protect such resources. Please see text additions to General Plan Land Use and Historic Resource Element policies and to EIR Historic Resources impact and mitigation discussions (EIR sections 10.4 and 10.8).

A3-2: Comment noted. EIR Heritage Resources Impact HER-3 identifies potential impacts to historic structures, including those caused by adjacent construction, as well as change in historic context. No substantial evidence exists in the literature that addresses the effects of a change in micro-climate on historic structures. Changes in micro-climate and associated potential alterations to moisture content in older adobe and potentially wooden buildings from increased shading might theoretically have the possibility of affecting structures, however no substantial evidence has been presented or exists in the literature or consultant team's experience that such impacts would be considered likely to occur, or that stringent measures beyond those already proposed as part of the draft Santa Barbara General Plan are necessary. Although the potential for impact appears to be low, Impact HER-1 has been modified to address this issue and Mitigation Measure MM HER-1a (Protection of Historic Structures and Buildings) has been amended to include requirements for study and mitigation where appropriate (e.g., older adobe structures). Please see the revised text in EIR sections 10.4 and 10.8.

A3-3 (Plan SB GPU): Comment noted. The EIR notes that the potential exists for the development/redevelopment of some new multiple-story buildings within El Pueblo Viejo including on parcels near to historic structures. At the State's request, the "bubbles" depicting potentially developable sites located on State owned property in El Presidio have been removed from the Housing Element Inventory sites map in Appendix F. As noted throughout EIR Sections 3 (Project Description) and 4 (EIR Growth and Policy Assumptions), it remains uncertain if, when, or where development could occur under the draft Santa Barbara General Plan and how many of or even if these Housing Element potential opportunity sites would actually be proposed by land owners for redevelopment. This level of analysis is sufficient to disclose potential impacts at a Program EIR level for CEQA purposes.

However, in addressing potential impacts on historic structures, the EIR acknowledges the role of existing policies and proposed Santa Barbara General Plan Update policies in protecting historic structures; and the EIR also identifies mitigation measures addressing construction and density and design policies to further reduce potential impacts.

For planning purposes, the City proposes to further refine its approach to protection of the historic resources of El Presidio and areas of the Downtown core by applying buffers and limiting the potential density and size, bulk, and scale of new structures, through adoption of new form-based codes and floor-to-area ratios that are more restrictive within these areas. Additional policy language has been added as Land Use Element LG14.5 and Historic Resources Element HR5 to establish buffers around historic resources (also reflected in Mitigation Measure MM HER-1). When combined with existing City policies and review processes and proposed new policies and mitigation measures, these measures would ensure protection of critical historic resources. Please see revised text in GPU Land Use and Historic Resources Elements, and EIR sections 10.4 and 10.8.

A3, California State Parks/Santa Barbara Trust for Historic Preservation (Continued)

A3-4 (Plan SB GPU): Comment noted. The City remains committed to working with California State Parks and the Trust and other interested parties to protect historic resources, while accommodating reasonable amounts of well-designed in-fill development within the Downtown commercial core areas. Additional policy language has been added as Land Use Element LG14.5 and Historic Resources Element HR5 to establish buffers around historic resources (also reflected in Mitigation Measure MM HER-1). The City policies also direct that the City will move forward with adoption of form-based development codes and floor-to-area ratios, a Historic Resources Element, and other tools to ensure that new development respects and protects historic resources and the City's character. The City would monitor these measures and new development to ensure that they are utilized to provide sufficient protection to resources in and around El Presidio. However, as noted in responses A2-6 and A3-2 above, proposed severe restrictions on new development in the blocks around El Presidio or extraordinary and untested ordinances regarding the shadow fan/shadow trace effect on historic structures appear unwarranted at this time.

The City would utilize the Adaptive Management Plan and mitigation monitoring as tools to review the effectiveness of historic resource protection policies and programs and progress adopting new resource protection tools. If this review indicates that existing and proposed tools require further readjustment or are somehow ineffective, the City would revisit these issues as required to ensure proper protection of historic resources.

A4, California Department of Transportation (May 17, 2010)

Response to Agency Letter # A4, California Department of Transportation (May 17, 2010)

A4-1: Thank you for your comments.

A4-2 (Plan SB GPU): Comment noted. The Adaptive Management Plan (AMP) is proposed to track progress toward implementing Plan policies and achieving Plan objectives, and to effect policy refinements and course corrections as needed through the 20-year Plan period. The AMP monitoring procedures will employ methods such as statistical evaluation, technical measurements, and the use of surveys, and will set out a schedule of regular reports. The EIR Mitigation Monitoring and Reporting Program (MMRP) directs that updates of the traffic model occur every three years to monitor traffic growth and effects on road and intersection congestion. General Plan Implementing Action LG 3.1a-Adaptive Management Program (*previously numbered AM1-4 during DEIR*) directs that the City monitor resource capacities for appropriate measurable community indicators, including transportation mode shifts at meaningful intervals. Policy LG 3.1b requires community indicator assessment every 4-8 years for various indicators, with comprehensive review in 2020 and 2030, while the MMRP requires review of the effectiveness of Transportation Demand Management (TDM) Programs. Under these measures, the City would monitor transportation performance, including specific developments if warranted, and provide for consideration of adjustments in programs every 4-8 years. Taken together, the AMP and MMRP measures would ensure ongoing monitoring, review of and potential adjustments to Transportation Demand Management programs and the assessment of mixed-use development projects. Additional information and outline of the Adaptive Management Program is found in the Staff Report of September 24, 2009 on the web site www.YouPlanSB.org.

A4-3 (Plan SB GPU): Comments noted and will be forwarded to decision-makers. Proposed draft Santa Barbara General Plan Update polices strongly encourage incentives for in-fill and affordable housing, as well as coordination on employer housing opportunities.

A4-4 (Plan SB GPU): Comment noted. Circulation Element Policy C1.5-Optimize Capacity (*previously C12 during DEIR*) requires that the City utilize Intelligent Transportation System (ITS) strategies to optimize system capacity, while Policy C2 (*previously C6*) directs that the City coordinate with other agencies on regional transportation and commuter transit. Under these policies, the City would coordinate with Caltrans on ramp metering for new interchange or onramp improvements (e.g., as done at Carrillo and Garden streets) or if required by major development projects. Citywide ramp metering at this time may not be warranted at the City's less heavily utilized onramps (e.g., Arrellaga Street) or may cause secondary surface congestion that would require further review (e.g., Haley or Castillo streets). Under the proposed polices, it may be more appropriate for the City to coordinate with Caltrans as part of future ramp improvements than on a citywide basis.

A4-5: Comment noted. The trip reduction assumptions for traffic generation under the draft Santa Barbara General Plan are relatively modest and would be substantially increased by the additional trip reduction measures required as part of mitigation measure MM TRANS-2c (Expand TDM Program) and -2f (Parking Management). Please see response A4-2 for a discussion of the role of the Adaptive Management Program (AMP) and Mitigation Monitoring and Reporting Program (MMRP) in the monitoring of and potential future adjustments to TDM programs.

A4-6: Comments noted. The following estimates of the total freeway volume composition, prepared using the City's General Plan Traffic Model, are also available in the EIR Technical Appendices, along with analysis methodology (please refer to Appendix J).

A4, California Department of Transportation (Continued)

	Existing Percentage of Total	Plan SB Percentage of Total
Internal Total	24%	20%
Internal to External Total	19%	15%
External to Internal Total	36%	39%
Plan Santa Barbara Study Area Total	<u>79%</u>	<u>74%</u>
Through Trips	21%	26%
Total Freeway Volume	<u>100%</u>	<u>100%</u>

A4-7: Comment noted. Please see response A4-4 and the discussion of Intelligent Transportation System (ITS) measures in section 16.4 of the EIR (Citywide Transportation Impacts).

A4-8: Thank you again for your comments. Please see the revised text in EIR section 16.1.9 (Pending and Planned Improvements) regarding the High Occupancy Vehicle (HOV) project boundaries. The City looks forward to working with Caltrans in improving regional coordination to manage traffic congestion through application of sustainable techniques and tools.

A5, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (May 18, 2010)

Response to Agency Letter # A5, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (May 18, 2010)

A5-1: No response required.

**#A6, California Public Utilities Commission, Rail Crossings Engineering
Section (May 6, 2010)**

Response to Agency Letter #A6, California Public Utilities Commission, Rail Crossings Engineering Section (May 6, 2010)

A6-1: Comment noted. Please see text addition to EIR section 9.2 (Applicable Plans and Policies, State Regulations and Agencies).

A6-2: Comment noted. The City has several at grade road and sidewalk crossings of the existing Union Pacific Railroad corridor, as well as multiple road and pedestrian bridge over and under crossings. The City's existing Circulation Element requires design of safe roads and pedestrian facilities and the standard City review process requires consideration of pedestrian and vehicular safety as part of approval of any new development project. Standard City review procedures will continue to require review of rail crossing safety issues, including increased vehicular and pedestrian traffic at grade crossing, as well as the potential for trespassing along the rail corridor associated with new development projects. Thank you for your comments.

**# A7, California Regional Water Quality Control Board, Central Coast Region
(May 6, 2010)**

Response to Agency Letter # A7, California Regional Water Quality Control Board, Central Coast Region (May 6, 2010)

A7-1 (Plan SB GPU and EIR): Comment noted. Thank you for your comments.

A7-2: Comment noted. The EIR finds that impacts to water quality under *Plan Santa Barbara* would be less than significant not due solely to limited change from existing conditions as referenced in this letter, but is based on the following:

- The EIR considers the cumulative effect of existing baseline conditions and existing regulations together with projected future growth under proposed updated General Plan policies and programs.
- The City has an extensive network of programs and policies in place to regulate new development and protect water quality, including a Storm Water Management Program (SWMP), a Storm Water Best Management Practices (BMP) Guidance Manual, and Storm Water Pollution Prevention Program (SWPPP), etc. Taken together, these and other City programs provide very strong regulatory oversight over new development and imposition of extensive measures to control and treat runoff from new development to ensure that it meets rigorous water quality protection standards (refer also to the Relevant Plans and Regulations table in section 11.2 of the EIR). These regulations are implemented and overseen by the City's Creeks Management Division together with staff of the Community Development, Public Works, Waterfront, and Airport Departments.
- The City's Creeks Management Division is funded for approximately \$2,000,000 per year to implement a range of water quality protection and improvement programs to actually improve existing water quality along a number of the City's existing creeks and drainages. Recent examples of such measures include the daylighting and restoration of sections of Arroyo Burro and Las Positas creeks and installation of low-flow diversions into the sewer system along reaches of creeks.
- More than 60% of new development is projected to occur largely as redevelopment within the City's urban core, with some limited net increases in structural square footage. As most of these sites are already covered with paved surfaces, and new development would be subject to more stringent water retention and treatment standards, the potential for increased "flashiness" and conveyance of polluted waters was judged to be limited or even to result in reduced amounts and improvements in the quality of runoff from newly redeveloped sites. The level of degradation present with the City's existing surface water bodies is the product of historical development patterns and practices which led to creation of extensive paved surfaces, stream channelization, loss of riparian vegetation, and associated declines in surface water quality. Over the last decade, the City has moved aggressively to reverse this trend, and has adopted policies and programs to not only ensure that new development does not adversely impact water quality, but that such development and citywide practices actually improve water quality. The EIR does not ignore cumulative impacts to water quality (refer to Section 11.5), but addresses them in the context of what should be considered a model program for preventing increases in pollution and gradually reversing declines in water quality caused by past practices.

A7-3 (Plan SB GPU): Thank you for the suggested policies. Existing City policies and programs and measures proposed in the EIR already address many of the seven points related to development inside the core commercial mixed-use areas as follows:

A7, California Regional Water Quality Control Board, Central Coast Region (Continued)

- The *Plan Santa Barbara* draft General Plan Update policies were in fact based on constraints analysis (City Conditions, Trends, and Issues Report, 2005 and update of the City Master Environmental Assessment Maps, 2008-2009). *Plan Santa Barbara* policies aiming to direct more than 60% of new residential and commercial development to commercial core areas already direct intense development away from environmentally sensitive areas and undeveloped watersheds such as Arroyo Burro, Cieneguitas, Upper Mission, and Sycamore creeks. In addition to strengthening creek setback and restoration requirements, proposed mitigation measure MM BIO-1 also requires identification and protection of important upland habitat and corridors (i.e., watersheds), while MM BIO-2 restricts alteration of creeks, sets a goal to “daylight” 0.5 miles of stream, and restore 20 acres or 1 mile of riparian habitat. Finally, ongoing City Creeks Division watershed management planning is being used to address the sensitivity of various watersheds.
- Existing City policies require that new development limit impacts to hydrologic functions and address limiting impervious surfaces and associated runoff and improving the quality of runoff. The imposition of numeric standards may have the potential to require extensive research and has the potential to be arbitrary without such research. For the type of development anticipated under this General Plan (redevelopment/limited greenfield development) similar beneficial results can be achieved through thorough implementation of the City’s existing standards and pursuit of the additional identified hydrology and biological resources mitigation measures. Existing City policies already require that new streetscapes and parking areas be designed to limit and treat runoff where possible and that new development minimize or reduce runoff volumes and improve quality while the City considers incentives for homeowners to improve creekside habitat and water quality. Please refer to pages 64-97 of the City’s 2009 SWMP and Sections 4, 5 and 6 of the 2008 SWPPP. Please see response A7-2 regarding ongoing City creeks and water quality management funding.

A7-4 (Plan SB GPU): Comments noted. Concrete numeric standards limit design flexibility, restrict the City’s ability to balance competing factors, and may not improve water quality beyond those measures already required by the City’s adopted programs. Existing City policies already require that site alteration and grading be minimized and that new development respect site topography and significant areas of native vegetation. The City places an extremely high priority on protecting and improving watersheds and water quality as exhibited by its commitment of over \$2,000,000 annually to protection, restoration, and enhancement of creeks and water quality. In considering potential project impacts, it is important to consider that the draft Santa Barbara General Plan and potential associated new development would move forward under the framework of one of the more stringent and best funded water quality protection programs in the State. As the City’s updates its storm water management programs and prepares watershed management plans, it will continue to consider RWQCB suggestions for improvements to these programs. Please also refer to response A7-3 above.

A7-5 (Plan SB GPU): Comment noted. Please note that Environmental Resources Management Element Policy ER17 already incorporates City SWMP policies into the General Plan, including those that would reduce the volume, rate, and pollutant loads of storm water runoff.

Thank you again for your comments. The City looks forward to working with RWQCB staff to seek continual improvements to water quality in the City and identifying the best available and practical means to achieve these benefits.

#A8, Montecito Water District (May 14, 2010)

Response to Agency Letter #A8, Montecito Water District (May 14, 2010)

A8-1: Thank you for your comments. Section 15.1.1 of the EIR (Public Utilities/Water Supply and Services) has been revised to describe the Montecito Water District's current role as a water purveyor and the current status of MWD water supplies.

A8-2: Comment noted. The EIR has been updated to address current MWD constraints on provision of water service and to provide a recommended measure (refer to Section 15.9, Recommended Measure RM PU-2-Montecito Water District Coordination) to ensure that water is made available to address any potential increases in new demand. This measure is reflective of existing City commitments to coordinate water supply issues with regional water purveyors as found in the City's existing Long Term Water Supply Management Plan and the draft Santa Barbara General Plan (refer to Public Services and Safety Element Policy PS6).

#A9, Santa Barbara County Air Pollution Control District (May 17, 2010)

Response to Agency Letter #A9, Santa Barbara County Air Pollution Control District (May 17, 2010)

A9-1: Thank you for your comments.

A9-2: Comment noted. The draft Santa Barbara General Plan Policy ER7-Highway 101 Setback (*previously ER12 during DEIR*) was crafted based on the general guidance published by the California Air Resources Board (CARB). However, as discussed in Section 6.4 of the EIR (Impact AQ-3: Location of Residential Land Uses), City expert consultants completed a more detailed City-specific analysis of this general CARB statewide analysis and policy (report was reviewed by APCD staff). The CARB 500-foot buffer recommendation was based on 2000 information that included higher diesel particulate matter emissions. The EIR analysis employs CARB's newer EMFAC2007 model, which shows that new vehicle standards, diesel fuel reformulation, and CARB-adopted Diesel Risk Reduction Measures have resulted in lower diesel particulate emissions. As a result, CARB's published health risk maps show that potential cancer risk near freeways would be substantially reduced in 2010 as compared to 2000 levels. Based on these changes since the CARB buffer guideline was developed, as well as the level of traffic and meteorological conditions in the City, the City analysis recommended that the setback could be reduced to 250 feet, while maintaining the policy to track implementation of the phased CARB regulatory program. This City analysis is more current, specific, and detailed for conditions within the city of Santa Barbara than the general statewide guideline set forth by CARB in 2005 and as such, as the most recent and up-to-date technical information, is utilized as the basis for analysis in the EIR.

A9-3: Comment noted. Please see the revised text on EIR Sections 6.1.3 (Existing Ambient Air Quality), 6.1.6 (Climate Change), Section 6.2 (Applicable Plans and Policies), and 6.3.2 (Impact Evaluation/Construction Emissions).

A9-4: Comment noted. Please see revised text in EIR Section 6.3.2 (Impact Evaluation/Electrical Use). In the interest of full information, the EIR continues to identify power plant emissions for criteria pollutants, but separates out those for criteria source pollutants that are outside the South Central Coast Air Basin.

A9-5: Comment noted. The Programmatic EIR analysis methodology is consistent with direction from APCD staff prior to the EIR preparation. The analysis of criteria pollutants for citywide long-range development finds that the impacts of increased emissions of criteria pollutants are insignificant, as they would fall below those forecasted in the Clean Air Plan (CAP). The CAP EIR found that a substantially higher level of growth within the City than evaluated under the *Plan Santa Barbara* General Plan Update would be considered a less than significant (Class 3) impact. From a CEQA perspective, the original use of the EIR does not affect the validity of this conclusion. Therefore, as authorized under CEQA Sections 15150 and based on the findings of the previous CAP EIR, this EIR finds that criteria emissions pollutants for the lower level of growth contemplated by the *Plan Santa Barbara* General Plan Update would also be Class 3.

A10, Santa Barbara County Association of Governments (May 17, 2010)

Response to Agency Letter # A10, Santa Barbara County Association of Governments (May 17, 2010)

A10-1 (Plan SB GPU and EIR): Thank you for your comments.

A10-2: Comments noted. Please see revised text in EIR sections 16.1.5 (Transportation Setting/Public Transit) and 16.2 (Applicable Plans and Policies).

A10-3: Comment noted. Because the widening of US Highway 101 from Hot Springs/Cabrillo to Carpinteria was not fully funded during preparation of the forecast, faces a number of technical challenges, and is still undergoing environmental review and public scrutiny, this project was not included in the 2030 forecasts. This approach provided an appropriately conservative CEQA reasonable worst-case assumption for transportation analysis purposes. While additional regional transit service from Measure A would help reduce future congestion, trip reduction from this service was also not included in model inputs, as available research generally supports that trip reduction would occur, but does not identify specific quantifiable trip reductions to this service. Please see the revised text in EIR section 16.3.3 (*Plan Santa Barbara* Traffic Model/Roadway Network Improvements), which further explains roadway network and transportation assumptions for the analysis.

A10-4: Please refer to Appendix J for a more complete discussion of elasticities. The elasticity values used in this analysis were based on a research synthesis of more than 25 academic studies prepared by Fehr & Peers for the United States Environmental Protection Agency. The studies included a wide variety of urbanized areas with a wide variety of available transit options.

A10-5: Comment noted. The parking pricing proposed under Plan Santa Barbara would apply only to public on-street parking; City College manages its own parking supply and the City does not have regulatory authority over the College. However, a parking cash-out ordinance as proposed MM TRANS-2.c would potentially provide a means of influencing private parking at City College.

A10-6: Comments noted. Please note that existing City policies and Transportation Division programs have long utilized transportation system management measures and supported regional commuter transit and rail. Please see revised text in EIR sections 16.4 (Citywide Transportation Impacts) and 16.1.5 (Transportation/Public Transit), which expand upon the role of Intelligent Transportation Systems (ITS) and the importance of expanding regional commuter rail service. In general, the EIR mitigation measures focus on transportation improvements where trip reduction benefits can be quantified based on available data and research. However, mitigation measure MM TRANS-2g (Improve Transit Services) has been revised to now specifically reference expansion of commuter rail service. Please also see General Plan Update Circulation Element Policy C2 (Regional Transportation and Commuter Transit) and Implementing Action C2.2 (Commuter Transit), as well as response to comment A4-4. As discussed in detail in Appendix J, while the City strongly supports expansion of commuter rail service, trip reduction benefits could not be accurately quantified based on available research and data within the project budget.

A10-7: Comments noted. Please refer to Appendix J for a complete discussion of TDM related issues, as it is not practical to comprehensively discuss every element of the Transportation Model within the text of the EIR while keeping the document to a manageable length. Please also see blue box discussions in section 16.8 (Transportation Mitigation Measures; MM T-2.f) regarding the relative effectiveness of improved parking management. Parking management can be controversial, however City decision-makers and stakeholders

A10, Santa Barbara County Association of Governments (Continued)

are actively discussing the benefits, trade-offs, costs, and issues associated with such programs. It is worth noting that programs such as pricing for on-street parking are practiced successfully in Downtown San Luis Obispo and other comparable California cities such as Santa Monica and Pasadena.

A10-8: Comment noted. A central goal of the Santa Barbara General Plan is to focus growth within the City's commercial core areas adjacent to transit service. Existing City practice, proposed General Plan Policy LG4 (Mobility Oriented Development Area) and Implementing Action LG4.2 (Focus Growth), and mitigation measure MM TRANS-2b (Increase Percentage of Downtown Housing Occupied by Downtown Workers) all direct the City to concentrate housing around transit nodes. The benefits of increased density are calculated for the entire Plan SB study area, including areas surrounding the Amtrak Station and SBMTD transit station. The Plan SB travel model is calibrated to account for the extent to which the inter-modal nature of these facilities influences current mode split. As such, development in the adjacent areas will capture the current level of mode shift benefit being experienced here. Precise adjustments to transit service at these facilities are not known for future conditions, and in order to provide a reasonable worst case analysis, the EIR analysis therefore does not assume particular transit service changes at these facilities.

A10-9: Comment noted. EIR Figure 16.5 (Future Study Intersections Level Of Service and Average Daily Traffic Volumes) identifies future traffic volumes based on the Santa Barbara Transportation Model and is labeled as such. The differences between horizon year forecasts for the SBCAG regional model and the Plan SB model are attributable to different post-processing methodologies. When comparing *raw model output* from the City model to *raw model output* from the SBCAG model, the horizon year forecasts are quite similar. For this analysis, the model volume post-processing methodology described in National Highway Cooperative Research Program (NCHRP) Report 255 was used. The NCHRP 255 method is the accepted professional standard, and post-processing model volumes is the typical approach to preparing traffic forecasts for sub-regional models, however it is by no means required and in certain situations it may be appropriate to use raw model output as opposed to post-processed count volumes. SBCAG, in *The Travel Forecast for Santa Barbara County*, did not post-process counts and instead reported raw model volumes. The differences between freeway volumes reported here, and those reported by SBCAG, are generally attributable to this difference in methodologies. Differences between forecasts in this case are logical and both approaches are technically correct. The reasons for SBCAG's decision to report model volumes can be found on page 12 of *The Travel Forecast for Santa Barbara County* (SBCAG, 2004).

A11, Santa Barbara County Public Health Department (May 10, 2010)

Response to Agency Letter # A11, Santa Barbara County Public Health Department (May 10, 2010)

A11-1 (Plan SB GPU): Thank you for your comments.

A11-2 (Plan SB GPU): Thank you for your comments. These proposed goals are addressed throughout the draft Santa Barbara General Plan Update. In particular, refer to the Desired Neighborhood Qualities section, Land Use Element Policies LG1-Resource Allocation Priority, LG4-Mobility Oriented Development Area (*previously numbered LG9 during DEIR*), LG5-Community Benefit Housing (*previously LG11*), and LG17-sustainable Neighborhood Planning (*previously LG15*), and the Food and the Environmental Resources Element Agriculture Policies. While these suggested goals are consistent with the intent of the General Plan Update, such detailed policy statements are best included in the appropriate Elements rather than the overall introduction.

A11-3 (Plan SB GPU): Thank you for your suggested policy additions. Many of these ideas are consistent with the policy direction in the General Plan (please refer to the policy sections for Land Use and Circulation elements). In addition, please see additions and modifications to the Environmental Resources Element Food and Agriculture policies.

A11-4 (Plan SB GPU): Thank you for your comments. Please see modifications to Public Services and Safety Elements policies PS12-Emergency Workforce and PS13-Consideration of People with Disabilities in Emergency Planning.

A12, County of Santa Barbara, Executive Office, Planning and Development Department, Fire Department (May 17, 2010)

Response to Agency Letter # A12, County of Santa Barbara, Executive Office, Planning and Development Department, Fire Department (May 17, 2010)

A12-1: Thank you for your comments. The City looks forward to continuing discussion and cooperation with the County to address regional planning and environmental issues.

A12-2: Comment noted. The proposed *Plan Santa Barbara* General Plan Update (GPU) provides policy direction to foster interagency cooperation to address regional environmental and planning issues such as water supply and transportation. As such, the draft EIR provides a detailed review of citywide water and transportation impacts, and discusses the City's potential impacts within the Sphere of Influence and other unincorporated areas, and contribution to regional cumulative impacts on the South Coast. In particular, the draft EIR provides discussion of potential impacts to US Highway 101, State Route 154, and the potentially affected segments of the regional arterial network. The GPU would continue the City's long-term commitment to growth management, and when combined with the mitigation measures contained in the draft EIR, sets forth vigorous trip reduction programs (i.e., car free measures). The City looks forward to ongoing and expanded efforts with the County to address transportation and other regional issues.

A12-3: Comments noted. The primary focus of new growth and development under the *Plan Santa Barbara* GPU would be in-fill development within the commercial core areas and adjacent areas. Under these policies, well over 60% of new growth would be expected to occur within these areas, and only limited development/redevelopment is anticipated on Coast Village Road. Such development would be further limited under the continuation of Measure E nonresidential growth restrictions which would apply to the largely commercial land use designations along Coast Village Road.

The future benefits of the US Highway 101 HOV lane project through Montecito were not reflected in the EIR analysis, as that project is not yet fully funded and has not received final approval. Diversion of regional traffic, from the US Highway 101 mainline onto Montecito streets, would be expected to be reduced with the completion of this project.

The EIR addresses possible issues of concern to the community of Montecito. The EIR identifies existing and future traffic volumes on key Montecito roadway segments such as Hot Springs, Olive Mill, and San Ysidro roads (Please refer to EIR Figures 16.2 and 16.5). The EIR also provides detailed analysis of congestion issues at key intersections along Coast Village Road (refer to EIR section 16.4-Impact Trans-1.3, and section 16.5-Regional Impacts to Transportation). Discussion of potential impacts to North Jameson Road and the San Ysidro interchange are also provided and additional analysis and discussion has been added (please refer to Section 16.5 and Table 16.12). The EIR finds that traffic volumes on San Ysidro Road would experience minimal changes from 10,450 ADT to 10,460 ADT, while traffic on Olive Mill Road would increase over 20 years by less than 10% from 7,850 to 8,570 ADT. Hot Springs Road is projected to experience the greatest growth in traffic from regional sources, with traffic increasing by an estimated 28% over 20 years, from 16,730 ADT to 21,370 ADT. As discussed in the text, continued congestion growth on US Highway 101 from regional traffic growth would lead to local area trips starting and ending in Montecito, and currently using the freeway, to divert to local Montecito roads. These include trips by Montecito residents in addition to trips to Montecito destinations such as Westmont College, which is undergoing expansion. Please refer to EIR section 16.5 (Regional Impacts to Transportation) to see added discussion which further describes potential future transportation issues in the community of Montecito.

A12, County of Santa Barbara, Executive Office, Planning and Development Department, Fire Department (Continued)

The City is aware of community concerns regarding potential parking spillover issues. However, please note that, consistent with recent amendments to the State CEQA Guidelines, parking supply impacts are considered to be a planning issue and not a CEQA issue. As such, consistent with City Ordinance requirements, future development projects along Coast Village Road would be subject to careful review for consistency with City parking standards, and potential for spillover of commercial/employee parking into residential areas would be considered at that time.

With regard to lighting issues, existing City policies and ordinances, as well as draft Environmental Resources Element Policy ER28 (Light and Glare) and Implementing Action ER28.1 (Lighting and Open Space) address outdoor lighting.

In addition, *Plan Santa Barbara's* transportation analysis is based on traffic conditions prior to initiation of construction of the ongoing US Highway 101 improvements and as such, the analysis is not affected by short-term construction-related diversions and realignment of traffic patterns associated with US Highway 101 construction (refer to discussion in section 16.3.3 Santa Barbara Traffic Model).

The EIR provides assessment of potential impacts of the small amount of potential build-out on Coast Village Road anticipated over the next 20 years during the Plan time period, and a more programmatic discussion of citywide and regional impacts of build-out over the next 40 years.

The City also appreciates the County's cooperation on improving coordination of regional planning issues along the Coast Village Road corridor. The City looks forward to working with the County to efficiently implement the new January 2010 MOU to ensure high-quality planning and appropriate community input for projects long Coast Village Road.

A12-4 (Plan SB GPU): Comment noted. The City looks forward to coordinating with the County on planning, transit, and streetscape improvements along the west end of Upper State Street and Hollister Avenue, particular during the Goleta Valley Community Plan update, as well as working on sustainable communities strategies and SB 375 issues.

A12-5: Comment noted. Please see revised text in EIR Sections 13 (Open Space and Visual Resources) and 14 (Public Services) regarding the Elings Park covenant.

A12-6: Comment noted. Please see EIR Section 2 revisions to Mission Canyon text and Figure 2.2 as suggested. Please see Section 4.0 for details on growth assumptions. Pending and permitted projects within the City that are not built or occupied as of 2009 are accounted for within the future growth forecast through 2030. For projects outside of the City, the EIR relies on information provided by the County, City of Goleta, and SBCAG, and pending projects are accounted for in the cumulative impacts analysis. Please see revised Section 4.0 (EIR Growth and Policy Assumptions) for a further explanation of this approach.

A12-7: Comment noted. *Plan Santa Barbara* is a policy-based document that does not set residential growth targets or restrictions. While adopted City policy controls the rate of nonresidential growth, these policies affect, but do not directly control the rate of residential growth. The amount of housing is identified as an EIR analytic assumption for purposes of impact analysis, and is based on long-term average historic growth trends and the City's adopted and proposed policy framework. For example, City zoning ordinances limit residential growth permitted under existing zoning in many circumstances (e.g., areas with steep slopes), but

A12, County of Santa Barbara, Executive Office, Planning and Development Department, Fire Department (Continued)

are also flexible and permit, but do not compel, development of residential uses as a dominant land use in many commercial zones. Further, Measure E and the City's zoning ordinance strictly limited nonresidential growth to a maximum of 3,000,000 square feet over the last 20 years, regardless of the underlying zoning, with about 1.5 million square feet built. The EIR evaluates the range of 1-2 million square feet net nonresidential growth over the next 20 years. As such, the EIR focuses analysis on realistic foreseeable development over the next 20 years while also providing a level of magnitude impact analysis associated with an estimated realistic full build-out which could potentially occur by 2050 or thereafter. As such, the EIR identifies residential growth and full build-out issues and analysis assumptions in Section 4.0, *EIR Growth and Policy Assumptions* rather than as part of the formal *Project Description*. Please refer to additional text in Section 4.0 which further explains build-out projects and the relationship of City ordinances to the Land Use map.

A12-8: Comment noted. Potential development and future build-out within the City is not based on the maximum of the designation range on the land use map alone, but would be substantially affected and often reduced by existing City ordinances and policy changes proposed in the *Plan Santa Barbara* GPU, including non-residential growth controls, environmental site constraints and ordinance requirements (density constraints, setbacks, FARs, parking requirements, etc.). The rate of residential build-out in the City has been remarkably stable over past decades. Individual property owner decisions and macroeconomic cycles and financing also affect build-out rates. Please refer to Sections 4.0 and 4.2.2 for a discussion of future growth and, in particular, the role of the City's Variable Density Ordinance. Changes to the variable density provisions are intended to adjust existing provisions to influence the type, size, and location of units, not increase overall build-out potential. Potential build-out in the high-density/commercial zones is projected to occur at similar (although slightly higher) densities than what can, and has recently been, occurring under the existing commercial designations in combination with the City's Variable Density Ordinance; as noted in Table 22.1, average densities in these commercial/high-density residential areas would increase from 20 units per acres under the No Project Alternative to higher potential densities within limited areas under *Plan Santa Barbara*. Thus, in this particular case, the new land use map is merely reflecting the actual *existing* potential to develop either commercial uses or higher-density homes in these areas as permitted under the existing Variable Density Ordinance. Therefore, *Plan Santa Barbara* is not anticipated to alter overall long-term City development potential.

To address the potential for growth under the *Plan Santa Barbara* GPU, the EIR provides both a 20-year horizon forecast, as well as a more programmatic full build-out analysis. This permits report reviewers to understand the implications of possible higher levels of growth without unnecessarily skewing the EIR's analysis toward unrealistic high-growth projections, which in turn would lead to an overestimation of project impacts and unneeded or unrealistic mitigation measures. This meets CEQA mandates to provide for a reasonable worst-case analysis. Given the fact that the City is largely built out, and most growth therefore occurs as redevelopment, with some net increases, the stability of long-term City growth rates and the multiplicity of overlapping regulations that regulate and control growth, it is extremely unlikely that residential growth would exceed the 20-year forecast. Even if this were to occur, as disclosed in the Additional Housing Alternative and Extended Range Forecast, changes in impacts would be minimal or modest in most cases. Further, given the dearth of housing, particularly affordable housing, being produced elsewhere on the South Coast, the unlikely exceeding of the residential growth forecast could result in beneficial impacts in

A12, County of Santa Barbara, Executive Office, Planning and Development Department, Fire Department (Continued)

such areas as regional jobs-housing balance, energy, transportation, and global climate change as discussed in the Additional Housing Alternative. Please also see response A12-3 above for a discussion of parking issues.

In addition, the proposed GPU provides for Land Use policies that require adequate resources to support additional growth, and an Adaptive Management Program with monitoring of resources and growth.

A12-9: Comment noted. The EIR estimates total growth in the Sphere of Influence based on historical growth rates, without specifying growth rates for any individual location. Therefore, inclusion of updated build-out information for the Mission Canyon area would not materially change projected sphere growth and recalculation is not warranted.

A12-10: Comments noted. The EIR identifies estimated future direct and indirect emissions associated with all projected growth and development within the City. The incremental increase in transportation of solid waste to the County's transfer station would be expected to involve several extra truck trips per day from various parts of the City, and would constitute an insignificant portion of overall increases in emissions.

The 2,795 new units is the total amount of residential growth projected to occur within the City over the next 20 years. The limited numbers of units potentially affected by a 250-foot setback from US Highway 101 would not affect this number, which is based on historic rates citywide and not the location of growth.

A12-11: Comment noted. The EIR mitigation measure BIO-2c does establish a required minimum creek setback standard of greater than 25 feet, which has been utilized as a standard City practice but only officially adopted in ordinance for Mission Creek. Please also see draft Environmental Resources Element policies ER16-Creek Resources and Water Quality (*previously numbered ER24 during DEIR*) and ER18-Creek Setbacks and Restoration (*previously ER26-27*). These policies provide for increased setbacks where appropriate and a process and criteria for developing more detailed guidelines. The City looks forward to working with the County on protection of Mission Creek and other streams, as well as on protection and restoration of steel-head populations, both as part of a future City policy review of setback requirements and individual projects.

Please refer to revised Policy ER13-Wildlife and Native Plant Habitat Protection and Enhancement (*previously ER19*). This measure would be implemented through a citywide mapping effort, coordination with private property owners, purchase or protection of habitats through easements where feasible, and review of individual pending development projects.

A12-12: Comment noted. The purpose of Figure 9.2 is to depict High Fire Hazard Areas and existing fire stations, not to show jurisdictional boundaries. Because the County, CalFire and the City all operate under mutual aid agreements, depicting such boundaries would not materially add to report reviewers' understanding of fire hazards and existing physical facilities related to fighting wildland fires.

With regard to existing City policies that affect fire protection access, please refer to the City's Fire Master Plan, the Wildland Fuels Management Plan on City Owned Lands, the Wildland Fire Plan/EIR, and City Municipal Code requirements, as discussed in section 9 of the EIR, and all available on the City web site (www.SantaBarbaraCA.gov/Departments/Fire).

A12-13: Comment noted. Please see revisions to Section 15.0 (Public Utilities/Water Supply). Please also refer to responses A8-1 and A8-2.

A12, County of Santa Barbara, Executive Office, Planning and Development Department, Fire Department (Continued)

A12-14: Comment noted. Please see revised text in EIR Section 13.1.3 (Open Space and Visual Resources Setting/Urban Visual Character/Neighborhoods/Foothills). However, it is important to note that the Existing Setting section does not describe County land use designations, but the actual current visual conditions and character of the broad reach of foothill neighborhoods which extend for several miles along the northern boundary of the City.

A12-15: Comment noted. Mitigation Measure VIS-1 (Open Space Protection and Restoration) applies to the broad reach of foothill neighborhoods which extend for several miles along the northern boundary of the City, and that support a wide range of parcel sizes, levels of development, slope, habitat types, etc. Implementation approaches for this measure are specified in the bullet points listed in MM VIS-1.

A12-16: Comment noted. With regard to water and wastewater services, the Cumulative Section 15.5 clearly identifies the amount of sphere of influence area for nonresidential and residential development forecasted to be served by the City. This forecast includes all sphere area development (e.g., Mission Canyon) anticipated by the City over the next 20 years.

In regard to solid waste, the EIR provides analysis of the City's potential contribution to the regional solid waste stream and effects on the Tajiguas Landfill. While no capacity constraints or issues appear to be associated with the County Transfer Station, please see added text in section 15.1.3 (Public Utilities Setting/Solid Waste Management) which further describes the role of the Transfer Station.

A12-17: Comment noted. The EIR describes regional transportation issues in some detail, including effects on County roadways and intersections including Hollister Avenue and Calle Real west of State Route 154 and the San Ysidro interchange. Please refer to Section 16.5 (Regional Impacts to Transportation), Tables 16.8 through 16.11 and new Table 16.12, and the discussion of *Regional Roads and Intersections*. The Congestion Management Plan (CMP) is discussed in sections 16.2 (Applicable Plans and Policies), 16.3.5 (City Impact Significance Guidelines), and 16.5 (Regional Impacts to Transportation/*Congestion on Regional Highways*). Please see Table 16.12 and the added text in *Regional Roads and Intersections* for further discussion of forecasted increases in regional traffic volume on County streets.

In terms of differences between recent County studies and this EIR for existing traffic levels of service (LOS) at Montecito area intersections, traffic counts for *Plan Santa Barbara* and associated calculation of LOS were taken before the Milpas to Hot Springs Road reconstruction of US Highway 101. Differences in LOS can be explained by construction-related changes in traffic patterns, by daily fluctuations or gradual changes in LOS over a two-year period between counts. Please see added discussion in Section 16.5 and added footnote on Table 16.6. While it is appropriate for the EIR to discuss this information, caution must be exercised in comparing the results of traffic studies undertaken under widely different circumstances.

With respect to improved coordination on bike paths, mitigation measures need not repeat existing policy, as such policy is already in effect and has the force of law. The EIR impact analysis includes reference to existing Circulation Element policies and the Bicycle Master Plan as part of the impact analysis. Mitigation Measure MM TRANS-2.d (Enhance Bicycle and Pedestrian Access and Infrastructure) expands on additional City actions to further enhance bicycle infrastructure and programs which can certainly include regional connectivity.

A12, County of Santa Barbara, Executive Office, Planning and Development Department, Fire Department (Continued)

A12-18: Comment noted. No major land use changes are identified for the City Airport, and the EIR analysis includes impacts associated with the Airport. The EIR discusses anticipated future traffic increases on Calle Real west of State Route 154. The limited increase in trash hauling vehicles would constitute an insignificant percentage of traffic increases.

A12-19: Comments noted. Please refer to the policies as numbered and described in the Draft Plan Santa Barbara General Plan Update (March 2010), as these are most current.

The City also looks forward to continuing dialog and regional coordination with the County.

A12-20: Comment noted. Please see revised figures in Sections 9 (Hazards) and 14 (Public Services) in response to the comment.

A13, Metropolitan Transit District (May 14, 2010)

Response to Agency Letter # A13, Metropolitan Transit District (May 14, 2010)

A13-1 (Plan SB GPU): Thank you for your comments. The City looks forward to continued and growing cooperation with MTD to address local and regional transit needs. Please see response A15-4 regarding Transportation Demand Management (TDM) measures.

A13-2: Comment noted. Existing Circulation Element policy continues, and the EIR mitigation measures need not repeat existing adopted or proposed policy.

A13-3: Comment noted. The EIR acknowledges that added cost would be incurred to effectively implement new or expanded transit service and the draft EIR Mitigation Monitoring and Reporting Program (refer to Table 23.1) proposes that the City prepare a comprehensive update to the TDM program by 2015 and consider transit during update of the City CIP from sources such as the City General Fund, Road Fund, and State and federal grants.

A13-4 (Plan SB GPU): Comments noted. The *Plan Santa Barbara* draft policy update proposed implementation of a “modest expansion of TDM”. The EIR analyzed the impacts of this proposed Plan and identified mitigation measure MM TRANS-2.c (Expand TDM Program) which would add the robust TDM measures as part of the *Plan Santa Barbara* GPU. The City would adopt the additional mitigation and/or adopt a clear set of findings and/or overriding considerations as to why such measures cannot be fully implemented or provide for substitute mitigation measures. Please see also response A13-3 regarding required City pursuit of funding for TDM/transit.

The City looks forward to working closely with MTD to address the challenging issues associated with implementing continued transit improvements along the South Coast over the upcoming 20 years.

A14, U. S. Fish and Wildlife Service (June 3, 2010)

Response to Agency Letter # A14, U. S. Fish and Wildlife Service (June 3, 2010)

A14-1: Thank you for your comments. Please refer to response A1-5. Text references have been revised in EIR section 7.1.

ORGANIZATION LETTERS

O1, Allied Neighbors Association (April 26, 2010)

Response to Organization Letter # O1, Allied Neighbors Association (April 26, 2010)

O1-1 (Plan SB GPU and EIR): Thank you for your comments. Your policy comments and recommendations will be forwarded for decision-maker consideration. The City has endeavored to maintain an open process to foster public participation and has held dozens of public workshops, outreach meetings to individual groups or organizations, and decision-maker hearings over the last three years. The City remains committed to obtaining maximum feasible public involvement during the General Plan adoption process and looks forward to continued Allied Neighbors Association involvement throughout this period.

The revised General Plan and EIR are formatted so as to be accessible to the public, and include the use of tables, maps, and graphs to concisely display information. However, because these documents deal with a citywide General Plan update with analysis and policy recommendations that span 20 years, a relatively substantial depth and complexity of analysis and supporting documentation is required.

O1-2: Comment noted. The assumptions within the EIR have been subjected to rigorous analysis for general feasibility as required under CEQA. In regard to the effects of downtown housing on trip generation, the EIR and the transportation studies and modeling provided in Appendix I provides extensive analysis of the trip generation characteristics of new housing in various areas of the City. Trip generation estimates for this type of development are based on empirical evidence. Under such circumstances, it would be inaccurate and misleading to show higher trip rates than shown by community-specific empirical analysis absent some compelling evidence that this would come to pass. No such evidence has been submitted. However, to foster improved understanding of the vigorous process used to derive project assumptions and to provide an overview of supporting evidence, please see the new “blue box in Section 4.3.1, *EIR Growth Assumptions*. Please also see response O3-7.

In the case of affordable housing, the EIR fully characterizes the challenges facing the City in managing the balance between jobs and housing and in providing for affordable housing. The EIR employs two methods to extensively analyze the overall jobs-housing balance and also assesses the balance of jobs and affordable housing based on employment types and relevant wages, not on assumptions of how much affordable housing might be yielded by higher-density housing. While the EIR concludes that the overall number of jobs and provision of housing will remain in rough balance under *Plan Santa Barbara* over the next 20 years, the EIR identifies a shortfall of an estimated 2,137 affordable units over the life of *Plan Santa Barbara*. The EIR further discusses the effects of several alternatives upon affordable housing, and considers regional cumulative effects on the South Coast.

The analysis within the EIR is fully consistent with the requirements of CEQA that EIRs employ a reasonable worst-case analysis. The law does not require a cataclysmic worst-case analysis that disregards existing evidence. The EIR does not assume that all new high-density downtown units will be affordable, but discusses increased affordable housing demand based on employment projections and compares that to historic rates of City production of affordable housing. The EIR identifies the challenges faced meeting this level of housing production due to the expiration of the City's Redevelopment Agency. Please see discussion in Section 19.4.2 of the EIR (Citywide Job Growth and Housing Affordability).

Similarly, the EIR does not assume that all residents of new housing will abandon their cars or work downtown; rather trip generation rates for new housing downtown are based on measuring the trip rates of existing housing downtown. In regard to the effectiveness of Transportation Demand Management (TDM), the EIR impact analysis assumes only a modest increase in TDM implementation as part of the analysis of *Plan Santa*

O1, Allied Neighbors Association (Continued)

Barbara and recommends that a much more vigorous TDM program be implemented as mitigation. While substantial empirical evidence is provided in Appendix I that such TDM programs have a very high probability of success in reducing congestion, the EIR continues to identify traffic congestion as a Class 1 unavoidable and significant impact, even after application of TDM measures. In addition, the EIR requires that the City implement a vigorous TDM program and/or adopt a clear set of findings and/or overriding considerations as to why such measures cannot be fully implemented or which provide for substitute mitigation measures. Finally, the Mitigation Monitoring and Reporting Program and the General Plan Update policies and Adaptive Management Program call for regular monitoring of implementation and progress toward Plan objectives, and provide for policy adjustments and course corrections as needed.

O1-3 (Plan SB GPU): Comment noted. The EIR contains two alternatives which provide for a maximum of 1,000,000 new square feet of nonresidential growth.

Residential growth under the Plan Santa Barbara scenario would equate to an average of approximately 140 units per year; however, no formal growth management mechanism has historically been used or is proposed to “pace” such development. However, the draft GPU policy LG 1.2 (*previously numbered LG3b during DEIR*) provides that resource capacities to support new growth would be monitored and housing policies adjusted as needed.

The EIR provides a range of options for decision-makers and the public on residential densities and discloses the tradeoffs and impacts associated with various approaches. The EIR also reviews a range of growth options, although the majority of growth under all options would be directed to the commercial core areas; all such development would be subject to existing and proposed new City policies regarding compatibility with existing neighborhoods.

In regard to design standards, the draft General Plan Update provides for development of new standards to address setbacks, open space, and other redesign issues for compatibility of new buildings in commercial zones (refer to Land Use Element Policies LG13-Community Character and LG14-Historic Structures (*previously CH9 – CH14*)). Creation of additional GPU implementation tools such as new overlays, form-based codes, and other tools would be subject to a full public review process.

O1-4 (Plan SB GPU): Comments noted. Initial Planning Commission recommendations to the City Council are to increase densities in the commercial and portions of multi-family areas of the City. The General Plan densities that are ultimately adopted by City Council are what will be referenced throughout the document. One of the goals of this General Plan Update was to be clearer on the General Plan Map and Land Use Element text as to the allowed densities throughout the City.

One of the initial implementation actions will be amendments to the existing Variable Density Ordinance to base density standards on unit size (instead of number of bedrooms). Amendments would reflect what the Council ultimately decides the density should be.

See implementation action added to LG5.1 Affordable Housing to include employer sponsored workforce affordable housing as Community Benefit Housing.

Plan SB Goal #2 as adopted by City Council in 2005 states that: Ensure affordable housing opportunities for all economic levels in the community, while protecting the character of established neighborhoods. While the provision of affordable housing is a top priority for the City, one of the challenges of developing the housing

O1, Allied Neighbors Association (Continued)

is the protection of neighborhoods and compatibility with surrounding areas. The City has strict design review and findings as part of the discretionary review of projects, and these issues would continue to be carefully considered as projects are reviewed.

The City recognizes that regional cooperation is necessary to help address the affordable housing issue. This is discussed in the Introduction to the Housing Element under “City in Context of the South Coast Region.” The Introduction to the Elements section of the General Plan has a discussion under “Regionalism” that explains the City’s role in the region and the need for a combined effort to address issues such as climate change, affordable housing, and regional transportation. See also proposed GPU policies EF21 (Regional Economic Strategy) and Housing Element Policies H22 (Work to Solve Regional Jobs/Housing Imbalance), H23 (Sustainable Regional Housing Solutions), and H24 (Cooperation on Legislative Changes).

O2, Citizens Planning Association (April 26, 2010)

Response to Organization Letter # O2, Citizens Planning Association (April 26, 2010)

O2-1 (Plan SB GPU): Thank you for your comments, which will be forwarded to decision-makers for consideration. The City adopted General Plan and the proposed goals and policy updates of the draft *Plan Santa Barbara* General Plan Update are in alignment with CPA's broad goals to maintain social diversity, economic and cultural vitality, and protection of natural resources and infrastructure availability.

O2-2 (Plan SB GPU): Comment noted. Two alternatives within the EIR limit nonresidential growth to 1 million square feet, while both *Plan Santa Barbara* and the No Project Alternative limit residential growth to 2,795 units (at 140 units/year). As part of the final General Plan adoption process, the City will consider hybrid alternatives which may blend various characteristics of the EIR alternatives.

Please note that the proposed new high-density zones are intended to reflect the existing practice of locating multiple-family homes in existing commercial zone districts and that this high-density designation is intended to increase the feasibility of providing the units as affordable housing, not to accommodate an increase in overall growth. Proposed Land Use and Housing Element Policies LG13-Community Character, H11-Promote Affordable Units, H12-Market-Rate Affordable Housing, H13-Non-subsidized Rental Housing, and H14-Sustainable Housing (*previously numbered CH9-14, H1-17 in Policy Preferences Report and DEIR*) are intended to ensure that new projects in the high-density zones provide increased amounts of affordable housing. These proposed policies also support smaller unit sizes, employer provided housing, and resale restricted housing. However, as discussed in detail in Section 19.0 of the EIR (Population and Jobs/Housing Balance), substantial shortfalls of affordable housing needed to meet demand from increased employment in the City is projected to occur under all of the Project Alternatives.¹ Therefore, if the City is to maintain or improve its historic commitment to provision of affordable housing, it will be important to keep as many tools available as possible, such as higher-density housing, while ensuring that such development reflects compatible design and minimizes or avoids environmental impacts.

O2-3 (Plan SB GPU): Comment noted. Housing Element Policy H18 (Monitoring of New Housing Gains and Losses) requires monitoring of affordable housing production while Land Use Element Policy LG3 (Live Within Our Resources) and Implementation Action LG3.1-Adaptive Management Program (*previously numbered LG2 and AM1-4*) also require monitoring of community indicators and policy adjustments as required. Please see response O2-2 regarding limitations on unit sizes and responses A2-1 and A2-6 regarding protection of community character.

O2-4 (Plan SB GPU): Comments noted. A major focus of the draft General Plan is "Living Within Our Resources", and new policies to address public health are proposed to be added to the General Plan (please see Policy LG12-Healthy Urban Environment, and policy updates in the Environmental Resources Element). The analysis in the EIR indicates that reactivation of the Desalinization Facility would not be required to meet water demand of any alternatives; rather this facility would remain available as an emergency drought buffer or an option if climate change induced alternations in water supply were to occur. In terms of landfill expansion, the County is planning to close the Tajiguas Landfill during the life of *Plan Santa Barbara*. The City's existing high level of waste diversion can help delay, but not avoid this closure and the need to explore other options for replacing waste disposal capacity, such as the waste-to-energy facility currently in initial planning stages for the Tajiguas site.

In regard to potential air pollution along roadway corridors, please see responses A9-2 and O3-8.

¹ The 4,400 units forecast under the Additional Housing Alternative could potentially meet or exceed affordable housing demand of 1 million square feet of nonresidential growth, but only if 30% of all units were provided as affordable, a major challenge given loss of Redevelopment Agency funding.

O2, Citizens Planning Association (Continued)

O2-5 (Plan SB GPU and EIR): Please see the revised GPU and EIR documents for corrected text and information updates. The City looks forward to working with CPA during the adoption phase of the General Plan Update as well as subsequent planning and implementation phases.

O3, Citizens Planning Association (May 14, 2010)

Response to Organization Letter # O3, Citizens Planning Association (May 14, 2010)

O3-1: Thank you for your comments.

O3-2: Comment noted. As required under CEQA Section 15126.6, the EIR describes a reasonable range of alternatives capable of fostering informed decision-making and reducing potential project impacts. EIRs often include a relatively wide range of project alternatives that do not always allow ready comparison of all impacts. For example, project-level EIRs often include alternative sites and uses. An alternative site may avoid site-specific impacts but raise different area-wide or cumulative impacts, such as impacts to different intersections, groundwater basins, or view corridors. Alternative uses may reduce or eliminate some impacts while changing or increasing other impacts. Assessing such a range of impacts permits decision-makers and the public to weigh and balance various issues. Further, based on such analysis, the EIR process often results in the blending or melding of elements of various project alternatives in order to combine the elements of each that most successfully achieve the Lead Agency's objectives while eliminating or reducing adverse environmental effects. A similar approach is being used for *Plan Santa Barbara*.

As discussed in Section 5 of the EIR, the City intentionally selected the range of EIR alternatives consistent with the range of growth and policy options under discussion by the community, to allow comparison of the outcomes of various growth level and policy scenarios and to foster public discussion on the range of potential impacts, ability to meet project objectives, and trade-offs between scenarios. For example, the range of non-residential growth considered among the alternatives is relatively small, between 1 -2.3 million square feet over two decades; much less than three million square feet the voters approved for the last two decades. The No Project and Project Alternatives both assumed the relatively larger amounts of non-residential growth, to ascertain if City economic vitality objectives could be better addressed while still minimizing potential impacts of traffic congestion, regional jobs-housing balance, and local resource and community character issues. The EIR analysis found that the No Project Alternative, absent improved Transportation Demand Management (TDM), yielded substantially more severe traffic impacts as well as somewhat more severe job-housing balance impacts and local resource impacts. The analysis of the proposed project revealed that application of even modest additional TDM measures resulted in measurable improvements in traffic operations as well as a general balance between jobs and housing due to lower commercial development (although not necessarily affordable housing).

The Lower Growth Alternative omitted expanded Transportation Demand Management (TDM) measures as inconsistent with the associated policy set which included maintaining or increasing parking requirements, and in order to test the efficacy of reduced development alone at avoiding or eliminating environmental impacts. The Additional Housing Alternative explored the effects of substantially increased housing development and stronger TDM measures on local and regional environmental issues. The exclusion of aggressive TDM from the Lower Growth Alternative, along with the No Project/Existing Policies analysis, clearly demonstrates that lower growth alone would not substantially reduce traffic congestion, while the outcome of inclusion of very extensive TDM in a higher growth scenario demonstrates the potentially critical role played by these measures in reducing congestion. EIR Section 16 (Transportation) clearly describes that the more extensive TDM is generally applicable to any alternative, as it achieves many of its benefits due to reductions in *existing traffic*, not just future traffic associated with net new development. However, the stronger TDM is most effective when accompanied by other Land Use and Transportation measures supporting convenient use of Alternative modes of travel.

O3, Citizens Planning Association (Continued)

As required under CEQA Section 15126.6, the EIR clearly describes the differences in impacts of each alternative and compares them to the *Plan Santa Barbara* project, which assists the public and decision-makers in identifying elements of each alternative that may be blended to meet City objectives and reduce adverse environmental consequences. Thus, as is typical in the CEQA process, and contemplated by the State General Plan Guidelines, the EIR provides a basis for a hybrid alternative based upon public and decision-maker input. Please see the additional Hybrid Alternative Analysis of the Final EIR that provides a summary of impacts associated with the suggested hybrid alternative assuming a majority of Project (*Plan Santa Barbara*) policies, together with the lower non-residential cap and alternative density, Transportation Demand Management, and compatibility measures taken from the Lower Growth and Additional Housing Alternatives.

O3-3: Comment noted. Please recall that the 15-25% assumption for affordable housing does not reflect the City's historic overall rate of providing 30% of new units as affordable, and accounts only for the City's Inclusionary Housing Ordinance and not for production from Housing Authority-subsidized housing or that provided by affordable by design reduced unit size and incentive provisions of the City's revised Variable Density Ordinance. While Section 19 (Population and Jobs/Housing Balance) of the EIR identifies the challenges faced by the City with future provision of affordable housing due to reduced funding (refer to EIR Section 19), *Plan Santa Barbara* and the Additional Housing Alternative both contain policies to increase densities, reduce unit sizes, and provide a mix of incentives (e.g., rental housing overlay) and disincentives to increase provision of affordable units and move away from production of high-end luxury homes. The EIR also provides recommended measures to maintain and improve provision of affordable housing.

The assertion that the Additional Housing Alternative would worsen the jobs-housing balance is not supported by substantial evidence. Please note that EIR Section 19 (Population and Jobs/Housing Balance) describes the potential for secondary employment growth associated with market-rate housing to worsen the jobs-housing balance, but concludes that such secondary increases in demand would be minimal and are assumed as part of the overall nonresidential component. The amount of additional residential development is small; such increases in secondary employment would be expected to be partially addressed by the existing labor pool, and demand would be expected to be minimized by changes to the City's Variable Density Ordinance, which would direct housing construction away from higher-end units toward more affordable by design construction, with a resultant dampening of associated secondary employment growth.

Both *Plan Santa Barbara* policies and EIR Section 19 recommend exploration of measures such as employer-sponsored housing (Policies H22.6-Coastal Housing Partnership, 22.7-Employer Incentives, 22.9-Affordable Student Housing), and the use of a rental housing overlay to increase production of rental units.

O3-4: Comment noted. The EIR provides substantial discussion of scenic views within the Downtown and the visual character of El Pueblo Viejo (please refer to the EIR Open Space and Visual Resources Existing Setting Sections 13.1.2-Scenic Views and 13.1.3-Urban Visual Character, as well as Section 10-Heritage Resources). The EIR discloses the potential visual effects of new building construction within El Pueblo Viejo for both the proposed project and the Additional Housing Alternative, and how existing and proposed policies would protect important views and historic resources. The EIR also describes the importance of the City's visual character with regard to tourism. Please also note the refined Mitigation Measure HER-1 - Protection of Historic Buildings, Structures, and Districts in EIR Section 10.8.

O3, Citizens Planning Association (Continued)

O3-5: Comment noted. The interrelationship between the City and South Coast jobs/housing balance is a complex citywide and regional issue. As such, the EIR addresses both City-specific and regional issues. EIR Transportation Section Table 16.1 summarizes transportation mode choices within the City and provides comparison to County and nationwide data, to permit reviewers to understand the current status of City and regional commuters. Figure 16.1 clearly addresses this and is titled “Commuting on the South Coast.” However, one sentence in the DEIR incorrectly assigned South Coast-wide commuting to the City. Please see the revised text in Section 16.1.1 (Transportation Modes) and Figure 15.1 which clarifies the relationship between commuters in and out of Santa Barbara compared to the South Coast.

O3-6: Comment noted. The EIR transportation impact analysis focuses on peak hour congestion, as it is the recognized period where the vast majority of City roads and intersections experience the highest utilization, and is accepted as the City and industry standard for analysis of traffic congestion related impacts (Highway Capacity Manual, Transportation Research Board, 2000). Where appropriate, the EIR discusses roadway friction and mid-block volume issues such as along Upper State Street and identifies potential impacts and mitigation measures (please refer to Impact TRANS-1.4 in EIR Section 16.4-Citywide Transportation Impacts). Traffic volume changes along Upper State Street are disclosed in Table 16.7 (Vehicle Trips Added to Corridors Where Traffic Flow May Be Affected by “Friction”). Please also see revised Figures 16.2 (Key Intersections Level of Service and Roadway Average Daily Traffic Volumes) and 16.5 (Future Study Intersections Level of Service and Average Daily Traffic Volumes), which identify volumes along Upper State Street. Potential impacts have been described in Impact TRANS-1.4 (Increased Roadway Corridor Congestion). At a citywide Program EIR level, it is neither feasible nor required to analyze mid-block traffic volume issues in further detail.

O3-7: The TDM measures included in the Additional Housing Alternative were found to meet the basic CEQA test for feasibility; 1) they are generally within the control of the City as Lead Agency to implement; 2) they are technically feasible and, as thoroughly discussed in the EIR and Appendices, have been successfully implemented within the City and/or by other jurisdictions; and 3) they are potentially within the City’s financial capability to implement over the long-term 20-year life of this project.

These measures were carefully screened by staff and the consultant team for legal, technical, and general financial feasibility. Measures that did not meet these tests were excluded. For example, while greatly improved passenger rail or full rail commuter service is a City and regional priority, the EIR does not assume its implementation over the next 20 years, as it is largely outside the City’s control, may not be technically feasible within this timeframe due to inter-agency and railroad coordination issues, and may require as yet unsecured or currently forecast funding sources.

City decision makers have the final determination on feasibility of measures, including financial feasibility. In the case of greatly enhanced transit service, full implementation could require substantial additional funding sources (e.g., revenue from priced parking) or the reassignment of existing revenue streams. These types of decisions require decision-maker assessment of costs, benefits, and trade-offs between funding various programs. CEQA also permits decision-maker disagreement with and alteration of mitigation measures based on substitution of acceptable measures or as supported by findings, e.g. pertaining to feasibility, conflict with other planning objectives, and/or overriding considerations. These measures are identified by the EIR as feasible from a basic legal, technical, and financial stand point, however the EIR cannot predict a particular decision-maker direction or outcome. The consequences of any such changes would need to be addressed as described above.

O3, Citizens Planning Association (Continued)

O3-8: Comment noted. *Plan Santa Barbara* GPU policies and the EIR both recognize the importance of protecting public health. The EIR provides detailed analysis of this air quality issue based on a City-specific study, as well as data provided by the California Air Resources Board (CARB) (please refer to EIR Sections 6.1.4 (Sources of Air Pollution/Onshore Mobile Sources/Transportation Corridors); and Section 6.4 (Citywide Air Quality Impacts/Impact AQ-3 [Location of Residential Land Uses]). Based upon both CARB studies and the City-specific analysis, no substantial evidence exist that significant adverse health effects would occur along roadway corridors with volumes of less than 100,000 average daily trips (ADT), absent an unusual percentage of heavy truck traffic. The presence of higher pollutant levels along roadway corridors does not establish a causal link to definitive health risks, and is not substantiated by CARB or the City study. EIR Mitigation Measure AQ-1 requires City pursuit of installation of walls and trees along U.S. Highway 101 to help reduce impacts along this corridor, but does not provide for further landscaping or setbacks where no significant impacts are identified, such as along City streets and arterials. Please also see response O9-2.

Letter Attachment (*The following responses to comments are regarding attachment comments on EIR Sections 10 (Heritage Resources) and 13 (Open Space and Visual Resources).*)

O3-9: Comments noted. See EIR text edits throughout Section 10 (Heritage Resources) with respect to various facts. Please note references to the Presidio added in EIR Sections 10.1.3 (Historical Setting/Historical Resources) and 10.2.2 (Applicable Plans and Policies/Landmark Historic Structures and District). Please note that the EIR project description and analysis is based on the January 2009 *Plan Santa Barbara* General Plan Update draft titled "Policy Preferences Report." Since that time, the Draft GPU has continued to undergo refinements, including changes in format moving the historical resources policies into a separate element and policy number changes.

O3-10: With respect to the comment regarding DEIR Section 10.4 (Impact Her-1-Archaeological Resources), asserting potential impacts to recent (unnamed) projects not prevented by existing policies: The EIR recognizes and assesses the potential for impacts to archaeological resources in the downtown historic core. The City's existing *MEA Guidelines for Archaeological Resources and Historic Structures Sites* establishes assessment guidelines for determining impacts on archeological resources consistent with Federal and State and City environmental review and archaeological resource protection provisions. Potential impacts to archaeological resources associated with all recent individual projects have been appropriately assessed under existing City policies and procedures through the preparation of Archaeological Resources Reports approved by the Historic Landmarks Commission, mitigation measures, and monitoring as required in the reports.

O3-11: Comments noted. Regarding archaeological resources, as discussed in EIR Section 10.4 (Impact Her-1/Existing Policies), the City has extensive and complete existing policies, criteria, and procedures consistent with Federal and State regulatory provisions for the evaluation and protection of important archaeological resources. Regarding historic resources, please note that the City is in the process of looking into elevation of the Brinkerhoff district to a historic preservation district. Please also see additional language added to Mitigation Measure HER-1 and General Plan Historic Resources Element policy HR5 regarding historic structure buffers and historic districts.

O3-12: Comments noted. Please note that the potential impacts associated with El Pueblo Viejo are further addressed in EIR Section 10.6 (Comparative Impacts of Project Alternatives), while the cumulative impacts on heritage resources across the South Coast are addressed in Section 10.5 (Regional Cumulative Impacts to

O3, Citizens Planning Association (Continued)

Heritage Resources). Also please note Mitigation Measure HER-1 (Protection of Historic Buildings, Structures, and Districts), which would add further historic resources protection policies and programs to the *Plan Santa Barbara* General Plan Update.

O3-13: The comment about the DEIR Section 10 page 10-23 Mitigation Measures discussion recommends that a mitigation measure include a proposal for a Historic Resources Element. This is not necessary because a separate Historic Resources Element is already part of the proposed project. The Element would retain existing City policies from the existing Conservation and Land Use Elements, and include recommended updated goals and policies for a new Historic Resources Element as included in the General Plan Update document. The full Historic Element would be comprehensively updated as a subsequent planning phase.

O3-14: Comments noted. Please see EIR text edits in Section 13.1 (Open Space and Visual Resources Setting).

O3-15: Comments noted. Please note, as identified in the EIR impact analysis, that the proposed Plan includes updated policies and programs to strengthen view protection. Please see EIR text edits removing Historic Landmarks Commission references in Impact VIS-3 existing policy discussions for areas where the Architectural Board of Review has jurisdiction.

O3-16: Regarding comments about DEIR Section 13 (Open Space and Visual Resources) pages 13-38 and 13-39, in recognition of the importance of El Presidio State Historic Park, new implementation actions requiring the establishment of a buffer around the el Presidio State Historic Park is recommended for inclusion in the General Plan Update. Please see additions to Land Use Element Policy LG14 and Historic Resources Element Policy HR5.

O4, Paul Hernadi for Citizens Planning Association (March 28, 2010)

Response to Organization Letter # O4, Paul Hernadi for Citizens Planning Association (March 28, 2010)

O4-1 (Plan SB GPU and EIR): Thank you for your comments. The City looks forward to working with CPA and other community organizations during the final adoption of the Santa Barbara General Plan Update.

O4-2 (Plan SB GPU and EIR): Comments noted. The estimate of 8,600 additional units at full build-out represents the estimated realistic residential development capacity under the existing and proposed General Plan Land Use map for EIR impact analysis. The changes proposed for *Plan Santa Barbara* could shift the location of development within the City but are not intended to increase overall development potential. This long-range estimate is also applicable to all four alternatives in the EIR. The amount of growth projected to occur under each different alternative over the next 20 years is estimated based on differing policy approaches for type, location, and pacing of growth, while the 8,600 units represents estimated realistic long-term residential development capacity. Please also see responses A12-7 and A12-8.

This estimate incorporates assumed use of City or State bonus density provisions on some parcels, as well as reductions in build-out potential due to environmental constraints and policy restrictions. For example, restrictions for development on slopes, within oak woodlands, adjacent to creeks, or on sites with historic structures (e.g., within El Presidio State Historic Park) would reduce the theoretical development potential of remaining undeveloped areas and underdeveloped parcels. Setback requirements, landscape standards, irregular lots sizes, and protection of major trees could also reduce development potential. Further, as discussed in responses A12-7 and A12-8, changes to the Variable Density Ordinance could also restrict development of outlying parcels. In summary, for long-range planning purposes, the EIR considers that 8,600 new units represents a reasonable worst-case estimate for long-range residential development potential within the City.

Potential setbacks from US Highway 101 are anticipated to be phased out over the next decade, would not materially affect overall long-term buildout numbers, and are considered similarly to the environmental constraints discussion provided above. Estimated maximum potential build-out within the 250-foot Highway 101 setback area is 1,249 units on 340 parcels. The revised Draft Housing Element Suitable Sites Inventory identifies 7,426 units citywide as estimated development potential for this 7-year Element, based on land use designation refinements and subtraction of the units within the 250-foot highway setback. Please also see response A12-10.

O4-3 (Plan SB and EIR): Comments noted. Job generation estimates were based on net new commercial development overall, not on assumptions of individual site development potential.

O4-4 (Plan SB and EIR): Comment noted. The term Mobility Oriented Development Areas (MODA) has not been abandoned, but was altered only to focus on the principles rather than a specific boundary. Please see proposed Land Use Element policy LG4 (*previously numbered LG9 during DEIR*), which discusses location of growth close to transit corridors, encouraging a mix of land uses, and measures to enhance mobility options. No major change in EIR analysis is warranted as the assumptions regarding projected development locations still apply.

O4-5 (Plan SB and EIR): Comment noted. Please see response O3-2.

O5, Coalition for Community Wellness (May 4, 2010)

Response to Organization Letter # O5, Coalition for Community Wellness (May 4, 2010)

O5-1 (Plan SB GPU): Thank you for your comments. The City appreciates the Coalition's concern for community health.

O5-2 (Plan SB GPU): Comments noted. Please see General Plan text revisions to Public Health in the Introduction Section.

O5-3 (Plan SB GPU): Comments noted. See text edits to the Public Health Goal. Policy LG12 (Healthy Urban Environment) indicates that the City will consider health in land use decisions. The City will add consideration of measurable health indicators (see text edits to LG3.1-Adaptive Management Program, *previously numbered AM 1-4*) where possible, however, the City cannot at this time commit to performing Health Impact Assessments as an integral part of our Adaptive Management Program. Due to budget considerations, City decision-makers will consider priorities, feasibility, and timing for such measures. Land Use Policies LG7.1 (Community Benefit Land Uses – Findings), LG12.2-Healthy Urban Environment – Guidelines (*previously CH7*), LG17.1b-Sustainable Neighborhood Plans (*previously LG15*), as well as Food and Agriculture Policies ER19-ER-24 (*previously ER31-36*) in the Environmental Resources Element all support and encourage community gardens, farmers markets, green roofs, green groceries, and regional agriculture. We appreciate suggestions as far as the type of incentives being suggested, because enforcing a use once established to carry fresh produce or healthy foods could be a challenge. The City looks forward to working with the public health community to develop appropriate incentives to encourage fresh food sales, as well as other health-related programs and projects within the scope of the City's regulatory framework.

O6, Coalition for Sustainable Transportation (May 11, 2010)

Response to Organization Letter # O6, Coalition for Sustainable Transportation (May 11, 2010)

O6-1: Thank you for your comments.

O6-2: Comments noted. The EIR analysis has clarified that potential future growth under the *Plan Santa Barbara* scenario could almost double “the number of intersections in the City functioning below LOS C *prior to implementation of proposed mitigation measures.*” Application of all available mitigation measures would substantially reduce this traffic effect, and would also improve compliance with State greenhouse gas reduction efforts.

O6-3 (Plan SB GPU): Comments noted. City decision-makers will consider this input when reviewing proposed policies, required mitigation measures, and the trade-offs between various project alternatives.

O6-4 (Plan SB GPU): Thank you for your comments. The City decision-makers will consider the priority for bike, Transportation Demand Management (TDM), transit, and pedestrian programs. Please consider the information in the Mitigation Monitoring and Reporting Program (Table 23.1) for the relative timing of various improvements.

O7, Coastal Housing Coalition (April 26, 2010)

Response to Organization Letter # O7, Coastal Housing Coalition (April 26, 2010)

O7-1 (Plan SB GPU): Thank you for your comments. These concerns about provision of housing affordable to the City's workforce and its relationship to long-distance commuting are reflected within *Plan Santa Barbara's* policy framework. The EIR alternatives provide a range of housing growth, densities, and policies for the decision-makers to select from.

O7-2 (Plan SB GPU): Comments noted. The Coalition's support for various policies will be forwarded to the decision-makers.

O7-3 (Plan SB GPU): Comment noted. The policies of *Plan Santa Barbara* require the balancing of many competing factors, including provision of housing, protection of community character, availability of public services, etc. The City is exploring ways to provide sufficient density within these confines to permit creation of affordable housing, including with the development of form-based codes, unit size restrictions, etc. The Coalition's concerns over this issue will be forwarded on to the decision-makers for consideration.

O8, Community Environmental Council (March 30, 2010)

Response to Organization Letter # O8, Community Environmental Council (March 30, 2010)

O8-1 (Plan SB GPU): Thank you for your comments, which will be forwarded for decision-maker consideration. The policies in the *Plan Santa Barbara* General Plan Update as well as the proposed EIR mitigation measures address both LEED efficiency standards and parking requirements.

O9, Community Environmental Council (April 28, 2010)

Response to Organization Letter # O9, Community Environmental Council (April 28, 2010)

O9-1: Thank you for your comments. The City appreciates CEC's involvement in climate change issues and the challenges that can arise when providing comments on evolving documents.

O9-2: Comments noted. Please refer to EIR Section 22.3 which discusses the Environmentally Superior Alternative. As noted in this section, the EIR identifies the Additional Housing Alternative as being environmentally superior for issues such as transportation, energy, air quality, climate change, and jobs housing. The EIR also notes that the Lower Growth Alternative is environmentally superior for issues such as public services, public utilities, biology, visual resources, heritage resources, hydrology and water quality, etc. and that the Additional Housing Alternative would better meet project objectives. The EIR does not identify *Plan Santa Barbara* as the Environmentally Superior Alternative.

O9-3 (Plan SB GPU): Comment noted. Your policy recommendations will be forwarded for decision-maker consideration. The EIR provides City decision-makers and the public with a range of alternatives to consider. In addition, the Planning Commission and City Council are considering a hybrid alternative which may blend desirable aspects of several of these alternatives.

O9-4 (Plan SB GPU): Comment noted. The *Plan Santa Barbara* General Plan Update does not propose imposition of a 40-foot height limit. The EIR Lower Growth Alternative considers this restriction in order to provide the public and decision-makers with information on the environmental effects of a range of options.

O9-5: Comment noted. The State CEQA Guidelines provide only very broad guidance in regard to determination of what constitutes a significant impact and leaves great latitude to lead agencies in identifying resources of local concern. For a number of CEQA issues such as visual resources, biological resources, and cultural resources, environmental review uses a qualitative approach to identifying impact significance, because there is no hard numerical threshold measure that works to incorporate the complex set of factors considered for all circumstances.

Communities considering urban redevelopment projects with substantial change in the built environment, especially those with historic downtowns, often consider community and/or historic character as a key issue of redevelopment projects. The City of Santa Barbara has long considered community character as part of the Visual Aesthetics portion of its Initial Study and CEQA documents for individual projects. The current EIR provides a similar approach but at a citywide programmatic scale.

Community character—that is the aggregate character of an urban area, its mix of historic and modern structures, varying architectural styles and sizes of structures, street trees, streetscape, open space, and view resources all combine to make up a community's character. Such issues are limited not merely to alteration of a single feature such as a view corridor. Thus, significant alternation of a community's skyline, demolition or serious alteration of historic or notable structures, removal of large numbers of street trees, or alteration of other character defining features are frequently used on CEQA documents as a basis for such impact analysis.

The EIR provides extensive documentation of the City's existing character, defining-features and qualitatively assesses future growth under proposed policies for potential alterations to the existing built environment to determine potential impacts.

It should also be noted that CEQA requires assessment of potential substantial changes to the environment,

O9, Community Environmental Council (Continued)

regardless if the overall change is adverse or beneficial. In this vein, the EIR discloses change that some residents may find adverse (e.g., additional new structures) while clearly stating that other residents may find the added urban amenities beneficial. This approach is entirely consistent with existing City practice, applicable CEQA statutes, industry standards, and the process in surrounding jurisdictions.

O9-6: Comment noted. The EIR discloses and discusses the roles of various City boards and commissions in the review process, as well as the proposed addition of new form-based codes and other programs. The EIR analysis, including recommended measures for additional policies provide information to assist City decision-makers in considering tradeoffs and balancing between retention of aspects of the City's existing community character with provision of needed new urban development.

O10, Community Environmental Council (May 17, 2010)

Response to Organization Letter # O10, Community Environmental Council (May 17, 2010)

O10-1: Thank you for your comments.

O10-2: Comment noted. However, the EIR does not identify *Plan Santa Barbara* as the Environmentally Superior Alternative. Please see response O9-2 and Section 22.3 of the EIR. In regard to climate change, while full and vigorous implementation of the Transportation Demand Management (TDM) and other programs of the Additional Housing Alternative may potentially reduce greenhouse gas (GHG) generation to at or below 1990 levels, the EIR employs a reasonable worst-case analysis as required by CEQA. Please also see response O10-9 below.

O10-3: Comment noted. The policy text in Table 4.3 has been updated to note that this policy could result in reductions in building heights next to historic structures and residential neighborhoods. The intent of this policy is to protect historic structures and residential neighborhoods through measures such as height restrictions; however, no specific height limitation is specified in the policy. The text in the EIR has been corrected.

O10-4: Comment noted. The comparative air quality impacts of the Additional Housing Alternative are described in Section 22.3. City decision-makers will consider the suggested inclusion of any robust TDM measures in the adopted plan.

O10-5: Comment noted. Please see revisions to recommended mitigation measures RM AQ-1.

P10-6: Comment noted. Section 22.3 identifies the Additional Housing Alternative as environmentally superior for Transportation-related impacts. Table 6-3 compares air pollutant and greenhouse gas (GHG) emissions for local tri-county average commuting distances versus long-distance commutes to Santa Barbara from Santa Maria, Lompoc, and Ventura.

O10-7: Comments noted. The Additional Housing Alternative is identified as environmentally superior for the issues of transportation, air quality, energy, climate change, and jobs/housing balance throughout the EIR.

Trip reduction benefits of car sharing programs can be anticipated, but could not be quantified at this time based on available studies. However, please see additional language added to MM TRANS-2 (Reductions in Traffic Demand) to encourage developers to offer car sharing in new core commercial mixed-use area developments together with unbundled parking.

Provision of the 5-minute peak hour headways suggested in the mitigation measures would constitute robust transit service. Funding sources to support implementation of this measure has not yet been identified.

O10-8: Comments noted. Section 17 (Energy) compares and contrasts the various environmental benefits, impacts, and tradeoffs of each project alternative in regard to energy usage.

Proposed policy ER1.3-Urban Heat Island (*previously numbered ER4 during DEIR*) includes a measure for providing incentives such as expedited processing for projects that incorporate green roofs. Please refer also to comment O10-9 below, and see revised language in recommended measure RM Energy-2 regarding green roofs.

O10-9: Comment noted. Projected greenhouse gas (GHG) emissions analyzed in the EIR are based on a reasonable worst-case approach as required by CEQA. While it is certainly possible that the adoption of the Additional Housing alternative could result in compliance with AB 32 and mitigation of the City's GHG contribution to global climate change, this would require full implementation of all City programs and mitigation

O10, Community Environmental Council (Continued)

measures that address this issue. Just as impacts occur incrementally over time, many of the TDM measures would be expected to be phased in over a 5- to 10-year or more horizon and would require further adjustments to be fully effective. AB 1463 and other State and federal actions would begin to influence the mixture of the vehicle fleet and the carbon content of fuel later in this decade; however, the majority or at least a substantial portion of the vehicle fleet in 2030 could continue to be older, less efficient cars. Given these circumstances, it appears reasonable to employ a conservative approach to this issue and describe the potential for meeting this goal, but continue to identify the impact of the Additional Housing Alternative as significant. However, please see the revised text in Section 18.4.2 (Evaluation of Future Citywide Greenhouse Gas Generation) which more fully describes these issues, including recent legislation and its potential effects on emissions.

In regard to green roofs, please see added text to RM Energy -2 (Residential, Commercial, and Industrial Energy Consumption). While green roofs would have limited benefits in terms of carbon sequestration due to relatively low biomass, shallow substrates, and the typical plants used (i.e., those using CAM photosynthesis), this measure has been added to the Energy section as green roofs may have the greatest benefit in reduction of energy usage, as well as possible water quality benefits. Some indirect benefits to GHG emissions could certainly arise due to reduced energy consumption.

O11, League of Women Voters (April 26, 2010)

Response to Organization Letter # O11, League of Women Voters (April 26, 2010)

O11-1 (Plan SB GPU): Thank you for your comments and policy recommendations, which will be forwarded to decision-makers for consideration. These issues pertain to the *Plan Santa Barbara* General Plan Update policies and not the adequacy of the EIR. These matters will be considered by the Planning Commission and City Council as part of the adoption process for the new General Plan.

Note that the transportation policies and the EIR analysis of land use and transportation policies do not assume that people won't drive but recognize differing vehicle trip generation rates of different policies and different areas (i.e., areas with a mix of uses and close to goods and services and with infrastructure supporting alternative travel modes have lower average vehicle trip generation). The long-established City Circulation Element policies and proposed policy updates under *Plan Santa Barbara* promote measures to improve mobility under all modes of transportation because if non-vehicle modes are convenient, some people will likely choose to use alternate modes for some of their trips. This helps to limit vehicle congestion and also improves livability. As documented in the EIR transportation analysis, studies have confirmed that specified land use and road patterns and transportation demand management measures do in fact result in lower vehicle trip generation rates. Proposed parking measures are intended to improve management of parking resources and provide appropriate supply for customers, residents, and employees, which may also result in reduced traffic congestion.

O12, League of Women Voters (May 6, 2010)

Response to Organization Letter # O12, League of Women Voters (May 6, 2010)

O12-1 (Plan SB GPU): Thank you for your comments which will be forwarded to decision-makers. These comments pertain to the proposed *Plan Santa Barbara* General Plan Update policies and not the adequacy of the EIR. These matters will be considered by the Planning Commission and City Council as part of the adoption process for the new General Plan.

O13, League of Women Voters (May 18, 2010)

Response to Organization Letter # O13, League of Women Voters (May 18, 2010)

O13-1: Thank you for your comments.

O13-2: Comment noted. The EIR identifies the Lower Growth Alternative as having relatively low energy demand from the built environment (i.e., lowest demand for electricity and natural gas), and lower commercial growth than the Project could also reduce transportation effects somewhat. However, the Additional Housing Alternative would be expected to have the least overall increase in energy demand as the transportation sector is the largest single user of energy in the City. With more affordable housing, fewer employees commute, and vice versa. Please see response O1-2 regarding assumptions in the EIR.

O13-3: Comment noted. The impacts and environmentally superior aspects of the Lower Growth Alternative are discussed and analyzed in Section 22.3 of the EIR. As described in that section, there are many aspects to this Alternative that are environmentally superior. The Additional Housing Alternative is identified as environmentally superior for issues such as transportation, energy, air quality, global climate change, and jobs-housing balance. The policy set assumed to go with the Lower Growth Alternative did not assume expansion of transportation demand management (TDM) measures such as reduced parking requirements and parking pricing. However, with application of more extensive trip reduction measures from the Additional Housing Alternative, the Lower Growth Alternative could potentially be made environmentally superior for energy issues and some transportation issues, but likely not for meeting objectives to improve the jobs-housing balance or to provide more affordable housing.

O13-4: Comments noted. Section 19.0, *Population and Jobs/Housing Balance* provides an in-depth discussion of housing prices, anticipated job classes/wages of new employees, and housing affordability. While it is beyond the scope of this EIR to forecast future home values and construction costs, the EIR does identify the projected shortfall of affordable housing under each alternative.

The EIR discusses that housing development in the City's R-3 and R-4 zones could contribute to affordable housing production (refer to Section 19.4 Implications of Population Growth and Jobs/Housing Balance).

In terms of future job growth under the Lower Growth and Additional Housing Alternatives, the EIR describes direct job growth from nonresidential expansion. Indirect employment growth from housing construction is discussed in Section 19.4.1 (Population and Jobs/Housing Balance; Citywide Job Growth and Housing Availability). Many such jobs would be expected to be filled by existing construction workers, households, or domestic staff. Increased demand for retail, service commercial, and institutional uses is accounted for in the job growth forecasts (please refer to Table 19-9). The EIR finds that the Additional Housing Alternative could substantially improve the City's overall jobs/housing balance and result in the greatest potential to meet affordable housing demand associated with future employment growth in the City.

O13-5: Comment noted. The EIR focuses on peak hour traffic since that is generally the period which road and intersection congestion is the greatest. For most facilities during most periods, non-peak hour traffic is generally free flow. Please see also responses O1-2 and O3-6.

O13-6: Comment noted and will be forwarded to decision-makers. The growth alternative, density standards, and non-residential development amounts will ultimately be decided by the City Council.

O13-7: Comment noted and will be forwarded to decision-makers. The EIR does discuss fiscal and energy costs of supplemental water supplies. Please see EIR Sections 15.1.1 (Water Supply and Service; Water Supply Planning Issues) and 17.7.2 (Energy and Climate Change).

O13, League of Women Voters (Continued)

O13-8: Thank you for your comments. Please refer to response O13-4 above and Section 22.3 of the EIR regarding identification of the Environmentally Superior Alternative.

O14, Mesa Architects (May 14, 2010)

Response to Organization Letter # O14, Mesa Architects (May 14, 2010)

O14-1: Comment noted. Please see discussion of Cliff Drive in Section 16.4 (Transportation; Impact TRANS-2) of the EIR.

O15, Montecito Association (April 27, 2010)

Response to Organization Letter # O15, Montecito Association (April 27, 2010)

O15-1: Thank you for your comments. The City looks forward to working with the Montecito Association regarding planning and environmental issues in the community and the finalization of the City's General Plan.

O16, Montecito Association (May 5, 2010)

Response to Organization Letter # O16, Montecito Association (May 5, 2010)

O16-1 (Plan SB GPU): Thank you for your comments, which will be forwarded to decision-makers. The EIR recognizes the existing qualities of Coast Village Road and the surrounding community. The EIR analysis assumed that a small increment of development would occur under the proposed Plan over the next two decades. Currently proposed EIR measures such as RM-VIS-1 (Open Space Protection and Restoration) and proposed Policy LG13 (Community Character) and Implementing Actions 13.1 (Design Overlays) and 13.2 (Building Size, Bulk, and Scale, *previously number CH9 during DEIR*), and LG17 (Sustainable Neighborhood Planning, *previously LG15*) would help address such concerns. It is anticipated that decision-makers will consider a hybrid growth and policy scenario blending aspects of the various alternatives studied.

O16-2 (Plan SB GPU): Comments noted. *Plan Santa Barbara* and the associated EIR provide for a number of adjustments and refinements adding more design review tools to City policy to improve compatibility of new development with surrounding uses. Please also refer to response O16-1 above.

O16-3: Comment noted. In regard to traffic congestion along Coastal Village Road, the primary source of increased congestion is anticipated to be diversion of traffic from the mainline of US Highway 101 that would be ongoing prior to completion of the US Highway 101 HOV lane improvements. While some small amount of growth and development along Coast Village Road would contribute incrementally to increased traffic congestion, it is not anticipated to be a major contributor to such congestion.

The draft EIR incorrectly identified the Hot Springs/Coast Village Road intersection as operating at unacceptable LOS in both the AM and PM peak hours (e.g., LOS F in the PM peak.). Corrected calculations indicate that this intersection would operate at LOC C in both AM and PM peak hours in the year 2030. Text has been revised in Section 16, *Transportation* and throughout the EIR. The City has requested that Caltrans and SBCAG place a new roundabout at Olive Mill with the future freeway HOV lane project. This improvement has the potential to restore acceptable operating conditions at this intersection through the year 2030.

In general, the City considers the adequacy of parking to be a planning and not a CEQA issue. Typically, planning standards call for business parking to be adequate to meet ongoing demands and not those associated with occasional special events peak use. Designing parking lots to account for intermittent special events would be prohibitively expensive, consume valuable land, and lead to creation of extensive areas of underutilized pavement. The Coast Village Road corridor generally has adequate onsite business parking or that available on Coast Village Road, such as angled parking on the Village frontage road and on the commercially designated portions of side streets.

The City will continue to coordinate with the County on development-related issues along Coast Village Road regarding new construction, including building size, bulk, and scale, parking, lighting, landscaping etc., as specified in the Memorandum of Understanding agreed to this year (please see County letter A12 for description). The City is also committed to coordinating with the Montecito Association, Coast Village Business Association, other interested organizations, and concerned citizens to ensure that new development along Coast Village Road is respectful of the community's character. Please see the proposed additional Plan policy language regarding coordination for this area.

O16-4: Comment noted. Please see added discussion of Montecito water issues in Section 15.0 (Utilities; Water Supply) of the EIR. Refer also to response A8-2.

O17, Montecito Association (May 17, 2010)

Response to Organization Letter # O17, Montecito Association (May 17, 2010)

O17-1: Thank you for your comments. The City recognizes the existing qualities of Coast Village Road and the surrounding community which are described in Section 13.1.3 of the draft EIR (Open Space and Visual Resources) and the draft General Plan Land Use Element Neighborhood Description. Proposed City policies such as Policy LG13 (Community Character) and Implementing Actions 13.1 (Design Overlays, including Coast Village Road) and 13.2 (Building Size, Bulk, and Scale) and EIR recommended mitigation measure RM-VIS-1 (Scenic Views) would directly address protection of the existing village qualities of Coast Village Road. The City looks forward to working with the Montecito Association, Coast Village Business Association, the County, and concerned community members to draft long-term guidelines that appropriately balance new development with protection of community character.

O17-2: Comment noted. Please see revised text in Section 15.1.1 (Public Utilities/Water Supply and Service) and Section 15.4, Impact PU-1 (Future Water Supply and Demand) which address Montecito related water issues. Also please refer to Comment A8-2.

O17-3: Comment noted. In EIR Section 16.5 (Regional Impacts to Transportation), please see the new Table 16.12 for intersection and roadway LOS in Montecito at build out of the Montecito Growth Management Ordinance. Section 16.5 provides a discussion of potential increases in congestion along Coast Village Road. When considering long-term implications of growth in traffic volumes along Coast Village Road, it is important to consider that while current operations are impacted due to construction on US Highway 101, completion of these improvements will greatly improve operations over the next 5 to 10 years. As discussed below, the EIR forecasts that gradual increases in traffic volumes and diversion from the main line would worsen operations on the Coast Village Road corridor toward the end of the 20-year planning horizon; however, this “reasonable worst-case” analysis does not account for completion of the proposed HOV lane improvements along US Highway 101 through Montecito, which have the potential to occur within this timeframe and could substantially improve the situation by reducing diversions..

In regard to local intersection operations along Coast Village Road, these intersections generally operate at free flow during non peak times. The stop sign-controlled intersection of Coast Village Road and Middle Roads experiences limited queuing along the main line during peak hours, but due to extremely low side street volumes, operates acceptably. Similarly, the uncontrolled intersection of Coast Village Road/Butterfly Lane operates at an acceptable level due to extremely low side street volumes and adequate gaps in traffic on Coast Village Road to permit side street turning access.

In regard to bicycle safety at the new roundabout, a National Transportation Research Board (NTRB) study recently produced a number of findings regarding pedestrian and bicyclist behavior at roundabouts. This research “did not find any substantial safety problems for non-motorists at roundabouts, as indicated by there being few reported crashes and a very small number of observed conflicts. In addition, no crashes and a very small number of conflicts were observed from video recordings of interactions between non-motorists and motorists” (NTRB, 2007). In addition, the City’s experience with the Milpas and Sycamore Canyon roundabouts indicate that once cyclists and motorists become accustomed to using roundabouts, perceived safety concerns diminish substantially.

O17-4: Comments noted. EIR Summary Table ES-3, which contains the impacts and mitigations you refer to, has been supplemented as requested with the identification of impacted intersections. However, EIR Transportation Section Table 16.6 lists 21 intersections as being impacted.

O17, Montecito Association (Continued)

In regard to mitigation of impacts to the intersections of Olive Mill and Coast Village Road, the EIR recommends either signalization or installation of a roundabout. Further, the City has requested that Caltrans and SBCAG place a new roundabout at Olive Mill with the future freeway HOV lane project. This improvement has the potential to restore acceptable operating conditions at this intersection through the year 2030. Please refer to mitigation measure MM TRANS-1a in EIR Section 16.8. The EIR does analyze the effectiveness and feasibility of roundabout or signalization of intersections at a program level, as is appropriate for a General Plan. Further consideration by decision-makers of feasibility and priorities regarding intersection improvements will occur. Basic steps involved with implementation such as detailed project study reports would also be identified by decision makers.

The draft EIR incorrectly identified the Hot Springs/Coast Village Road intersection as operating at unacceptable LOS in both the AM and PM peak hours (e.g., LOS F in the PM peak.). Revised calculations indicate that this intersection would now operate at LOC C in both AM and PM peak hours in the year 2030. Text has been revised in Section 16, *Transportation* and throughout the EIR. Further, please remember, as discussed under response O17-3 above, completion of the US Highway 101 High Occupancy Vehicle (HOV) lanes was not assumed in this conservative analysis, but could improve road and intersection operations along Coast Village Road, as diversion from the mainline would be substantially reduced or potentially eliminated.

Please see amendments to Table 16.6 in EIR Section 16.4 (City Transportation Impacts), which highlight in bold the intersections subject to mitigation through feasible physical improvements.

The originally proposed MODA boundaries did not include Coast Village Road. The revised draft General Plan Update no longer has mapped MODA boundaries and utilizes MODA principles. Implementing Actions LG4.2(Focus Growth), LG4.3 (Mix of Land Uses) and LG4.4 (Mobility and Active Living) [*all previously numbered as part of LG9 during DEIR period*] call for focusing growth within ¼ mile of “frequent transit service”, in areas with a mix of uses, “particularly Downtown” and to link mixed-use developments with “main transit lines.”

Per January 2010 changes in the State CEQA Guidelines, parking is considered to be a planning and not a CEQA issue. Planning standards call for business parking to be adequate to meet ongoing demands and not those associated with occasional special events peak. Designing parking lots to account for intermittent special events would be prohibitively expensive, consume valuable land, may induce additional traffic, and lead to creation of extensive areas of underutilized pavement. The Coast Village Road corridor generally has adequate onsite business parking along with that available on Coast Village Road, such as angled parking on the Village frontage road and on the commercially designated portions of side streets.

The City will continue to coordinate with the County on development-related issues along Coast Village Road regarding new construction, including building size, bulk, and scale, parking, lighting, landscaping etc., as specified in the Memorandum of Understanding agreed to this year (please see County letter A12 for description). The City is also committed to coordinating with the Montecito Association, Coast Village Business Association, other interested organizations, and concerned citizens to ensure that new development along Coast Village Road is respectful of the community’s character. Please see the proposed additional Plan policy regarding coordination for this area.

O17-5: Comments noted. Please see added discussion of the Coast Village Road area in EIR Section 13.1.3 Urban Visual Character; Coast Village Road.

O17, Montecito Association (Continued)

Please refer to proposed Policy LG13 (Community Character) and Implementing Action 13.1 which would require adoption of a design overlay along Coast Village Road. Please also refer to Implementing Action LG13-2 (previously numbered CH9, CH14) which addresses building size, bulk, and scale. The Mitigation Monitoring and Reporting Program and Adaptive Management Program will establish priorities and time frames for implementation, and monitoring of effectiveness. Inclusion of these proposed policies and programs as part of the General Plan Update project provide for reduction of potential environmental impacts to less than significant levels.

O17-6: Comments noted and policy recommendations will be forwarded for decision-maker consideration.

EIR Summary: References to the impacts summary tables have been added to a new Section on page 9: Listing of Impacts.

Mitigation Trans-1.a: This measure has been amended to read “Installation of *Improvements* at Intersections Currently Controlled by Stop Signs. In regard to a new signal at Hot Springs Road, installation of signal at a location with a roundabout is generally infeasible and counterproductive. Please note, the draft EIR incorrectly identified the Hot Springs/Coast Village Road intersection as operating at unacceptable LOS in both the AM and PM peak hours (e.g., LOS F in the PM peak.). Revised calculations indicate that this intersection would now operate at LOC C in both AM and PM peak hours in the year 2030. Text has been revised in Section 16, *Transportation* and throughout the EIR. The City has requested that Caltrans and SBCAG place a new roundabout at Olive Mill with the future freeway HOV lane project. This improvement has the potential to restore acceptable operating conditions at this intersection through the year 2030.

Mitigation Noise-1: Comment noted.

Fire Protection: Comment incorporated; please see revised text in EIR Hazards Section 9.2.1, Relevant Plans and Policies.

Emergency Response: Coast Village Road falls within acceptable response times for City fire service. In addition, the City maintains a mutual aid agreement with the Montecito Fire Protection District which can provide service to this area from both Stations 1 and 2, and all fire and police protection service providers in the area also coordinate with respect to disaster planning and response.

O17-7 (Plan SB GPU): Comment noted and recommended land use policies will be forwarded for decision-maker consideration.

As GPU Implementation Action LG13.1 (Community Character/Design Overlays) for Coast Village Road is carried forward, the concept of buffers or setbacks from residentially designated neighborhood properties could certainly be a consideration. Action LG13.2b (FAR) has been refined to include particular attention to protection in areas adjacent to single-family zoned neighborhoods. The City will work with the County and Montecito Association, Coast Village Business Association, County, and concerned community members to draft appropriate standards for development on Coast Village Road with consideration for protection of the neighboring residential community, and in monitoring of implementation as part of the Adaptive Management Program

GPU Implementation Measure 13.2.b.i-Floor Area Ratios (*previously numbered policy CH15*): Please see text correction.

O17, Montecito Association (Continued)

Buffers: Yes. GPU Land Use Policy LG 13 (Community Character) and its implementation measures are intended to provide additional guidelines and tools to ensure compatibility.

GPU Policy ER28.1 (Lighting and Open Space) pertains more to open space such as beaches, foothills, and Las Positas Valley. However, the existing City lighting ordinance will also continue to address light and glare issues in future development. The Coast Village Road Design Guidelines could also further address this issue.

Implementation Action C.6.1 (Impacted Intersections): Comment incorporated. Please refer to revised Implementation Action C.6.1 for addition of Coast Village/Olive Mill/U.S. Highway 101 to list of impacted intersections.

O18, Pearl Chase Society - Kellam Chase (April 22, 2010)

Response to Organization Letter # O18, Pearl Chase Society - Kellam Chase (April 22, 2010)

O18-1: Comments noted and forwarded to decision-makers.

The reference to the City's Master Environmental Assessment (MEA) is to explain its use by the City in the review of proposed projects for potential impacts to Heritage Resources.

The City retains the option to select from among the various alternative growth scenarios and policy options, or a "hybrid" scenario blending elements of the alternatives. The final adopted General Plan Update document would reflect the policies selected. The EIR would remain valid if the Lower Growth Alternative was selected.

The City Council approved a process for a phased adoption of the updated General Plan components, consistent with past practice. Existing General Plan policies protective of heritage resources, such as in the existing Conservation Element, would remain. The General Plan Update policies proposed in this planning phase would also provide updated policy direction for Historic Resources protection, for immediate use upon adoption, and also to provide direction for the development of a comprehensive new Historic Resources Element in a subsequent planning phase.

O19, Pearl Chase Society (April 22, 2010)

Response to Organization Letter # O19, Pearl Chase Society (April 22, 2010)

O19-1: Thank you for your comments. As per the City Council approved scope and phased process for the Plan Santa Barbara General Plan Update, the current planning phase includes incorporation of updated policy direction for historic resources protection, with the development of a comprehensive new Element based on that policy update as a subsequent planning phase. The EIR reviews the impacts of the project as proposed. The absence of a separate comprehensive new Historic Resources Element does not make the EIR inadequate. The EIR analyzes potential impacts of future growth on historic resources, based on the effectiveness of existing historic resources and the proposed updated policies and programs to address historic issues.

Archaeological, historic, and paleontological resources are identified in the EIR as “Heritage Resources”.

O19-2: The EIR Section 10.1 (Heritage Resources Setting) clearly describes the roles and direction of existing City ordinances including the El Pueblo Viejo Design District in protecting historic resources. The number of historic structures in the City is noted on Figure 10.1 and discussed in Section 10.2.

O19-3: Comment noted. The EIR does recognize the many historic resources throughout the City. However, technically speaking, the entire City as a whole does not qualify as a “historic resource” within the technical criteria for historic resources. Please refer to Section 10.2.1 of the EIR (Applicable Plans and Policies/Archaeological, Paleontological, and Historical Resources).

The EIR analysis finds that existing and proposed new General Plan policies together with identified mitigation measures would reduce potential impacts to historic resources to less than significant levels. Please refer to mitigation measure MM HER-1 (Protection of Historic Buildings, Structures, and Districts) and General Plan policies LG13 (Community Character), LG14 (Historic Structures, *previously numbered as CH10 during DEIR period*), and HR3 (Development Adjoining Designated Historic Structures, *previously numbered CH4*).

O20, Santa Barbara Association of Realtors (April 28, 2010)

Response to Organization Letter # O20, Santa Barbara Association of Realtors (April 28, 2010)

O20-1 (Plan SB GPU): Thank you for your comments. These comments address the general direction and content of the General Plan Update and do not pertain to the adequacy of EIR. These comments will be considered by City decision-makers during the General Plan adoption process.

O20-2 (Plan SB GPU): Comments regarding draft Land Use and Housing Elements are noted. With respect to the goal of fostering more 3 or more bedroom affordable units, additional proposed policies under consideration would provide for density bonus for rental projects, and densities of between 46-60 dwelling units per acre for significant Community Benefit projects such as apartments with 3+ bedrooms. For individual projects, the Planning Commission would need to make findings of sound community planning and substantial community benefit on a case by case basis. Although the specific details and findings for the new density program have not been developed, flexibility has always been envisioned for Community Benefit and affordable residential projects. As a point of clarification, the Average Residential Density Policy is not intended to apply to single family or two family zoned properties.

With regards to FARs, a higher FAR would result if the Council adopts the increases to the high density designation at densities of up to 45 dwelling unit per acre. In addition, because mixed use could still be proposed on some of the commercially zoned parcels, the parking and commercial components would need to be factored in and would increase the FAR.

Although the specific details for community gardens have not been developed nor any sites identified at this time, the City has no intention of “taking” private land for purposes of establishing community gardens. The City would look at primarily City owned land but would encourage private property owners to participate if acceptable to them. At the time that Sustainable Neighborhood Planning occurs (Land Use Element Policy LG 17) or when proposed Open Space and Parks Element Policy OP1.1 (Park and Open Space Standards and Planning) is implemented, individual neighborhoods could identify prime locations that would serve their neighborhoods. The property owners would be involved in any decision to use a person’s private property before it is developed as a community garden. A new Implementation Action (LG12.4) is under consideration directing that an audit of local government owned land be conducted to determine potential use for community gardens.

O20-3 (Plan SB GPU): Draft Environmental Resources Element comments regarding proposed creek setback standards are noted. The City has long-held existing policies and programs to provide for adequate flood control and protect creek water quality and habitat resources, consistent with federal and state regulatory requirements (see existing adopted General Plan Conservation Element, Storm Water Management Program, Floodplain Ordinance). Policies to apply adequate creek setbacks as development gradually occurs are ongoing, as are City programs to improve creeks along public property. Current City practice generally provides for creek setbacks of 25 feet or more per the Mission Creek standard.

Proposed policy updates would improve the clarity, effectiveness, and predictability of City creek protection policies, programs, and standards, which is necessary to maintain adequate flood control, water quality, and habitat resources, and avoid significant cumulative effects from incremental growth, consistent with federal and state regulations. Issues raised by the commenter about the difficulties in establishing and implementing appropriate standards are acknowledged. The proposed process for identifying more specific creek setback standards (per Policy ER 18.1 – Creek Setbacks) would be a public process with property owner involvement.

O20, Santa Barbara Association of Realtors (Continued)

The proposed General Plan Update also includes a program (ER 16.3 – Master Drainage Plan) to better address drainage issues.

O20-4 (Plan SB GPU): Draft Circulation Element comments are noted. The goal of these policies is to improve the access of downtown residents to all modes of transportation, and not to disadvantage car ownership to those who chose to own automobiles. On-street parking would remain available throughout the existing residential neighborhoods and commercial districts, and residential parking would be protected under the City's residential parking program. In regard to Policy C7.6-Residential Parking Requirements (*previously C18*), this policy has been reworded to allow reductions in parking requirements for certain types of units or developments (e.g., rental, affordable, etc.). This flexibility would permit but not require a reduction in parking maximums. Taken together, these changes would improve transportation choices available to downtown residents while still facilitating ownership and use of the automobile.

O21, The Santa Barbara Conservancy (May 17, 2010)

Response to Organization Letter # O21, The Santa Barbara Conservancy (May 17, 2010)

O21-1 (Plan SB GPU): Thank you for your comments. The City appreciates the contribution that the Conservancy makes to our community.

The City too recognizes the importance of preparing a new Historic Resources Element and plans to move forward as expeditiously as possible with the project. However, the Conservancy should be aware that existing City policies protective of historic resources will remain in place, and the General Plan Update provides updated policy direction for further historic protection which would go into effect with the adoption of the Plan Santa Barbara General Plan Update, and would provide direction for the more comprehensive development of a separate new Element.

O21-2: Errors and omissions in the draft EIR (and draft General Plan Update document) have been corrected. Please see the revised text in the EIR Section 10 (Heritage Resources). Accuracy of factual information is important. However, because the errors were frequently related to facts about dates and occurrences that transpired over 100 years in the past, they did not materially affect the EIR's analysis of potential future impacts to historic resources, which was based on impacts to existing designated and potential landmark structures, structures of merit, potential historic structures, and historic districts or areas of the City. Further, recognized historic districts or neighborhoods are disclosed in the EIR.

The City looks forward to working with the Conservancy on the future creation and adoption of a Historic Resources Element.

O22, Downtown Organization (April 23, 2010)

Response to Organization Letter # O22, Downtown Organization (April 23, 2010)

O22-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with the Downtown Organization (DO) to sustain an economically vibrant downtown, and to foster and expand the public-private partnership between the City, DO, and local businesses. To address concerns raised by the DO that the draft General Plan Update does not adequately recognize the importance of Downtown, please see the revised text added to the Economics and Fiscal Health Element which describes Downtown's key role in the economic health of the City; the revised text also incorporates a number of policy addition/modification concepts suggested by the DO.

O22-2 (Plan SB GPU): Comments noted. The traffic analysis in the DEIR determined that Downtown residential development generally does not make congestion worse and can have the effect of creating less new future peak hour trips if the residents of such housing units are members of the workforce. Rather, it is the non-residential or commercial land uses that were found to increase congestion over time. The traffic mitigation measures in the DEIR are specifically designed to address congestion created by incremental commercial growth. Commercial growth is commonly viewed as a necessary ingredient to maintaining and stimulating economic growth and vitality. Decision-makers, as well as Downtown stakeholders, will need to balance desires for maintaining traffic congestion levels with the amount of new commercial growth, and the need to implement Traffic Demand Management strategies that accomplish this goal.

O22-3 (Plan SB GPU): Comments noted. The draft General Plan and EIR both recognize the challenges facing the City with regards to provision of affordable housing. The draft General Plan provides multiple incentives for construction of affordable and rental housing, including a policy to create a new rental housing overlay, and increased entity provisions for rental housing. The City also recognizes the importance of providing rental housing downtown.

O22-4 (Plan SB GPU): Comments noted. Please see response to comment O22-2. The phased approach for TDM would be outlined in the Adaptive Management Program.

O22-5 (Plan SB GPU): Comment noted. The information and conclusions of the transportation section of the DEIR are based on technical information and analysis but do not rely on a detailed census of the Downtown workforce. Nor is a census needed to reach better or more accurate conclusions. However, at the direction of City Council, staff would be pleased to partner with the Downtown Organization on the items mentioned.

O22-6 (Plan SB GPU): Comment noted.

O22-7 (Plan SB GPU): The existing Circulation Element directs the development of a Parking Master Plan. This is not proposed to be changed.

O22-8 (Plan SB GPU): Please see response to comment O22-5. The need and use of information should be established and strategized before embarking on expensive data gathering exercises. A Downtown employee census might be used for benchmarking for the Adaptive Management Program. Historically, congestion levels have been used to determine the success of the City's transportation improvement efforts, included demand management. Decision-makers could supplement or replace this information with employee census information.

O22, Downtown Organization (Continued)

O22-9 (Plan SB GPU): The amendment has been added to the proposed policy as suggested. This was the original intent. Thank you for the clarification. Please see text edit to Policy LG4.4 (Mobility and Active Living).

O22-10 (Plan SB GPU): Because the current and proposed updated policy for Downtown is to provide for adequate customer parking, the tool to add more customer parking supply remains a valid, although expensive, strategy.

O22-11 (Plan SB GPU): LG 4.6 (Mobility Oriented Development Area/Parking Demand) is not intended to reduce parking supply, but rather to meet the parking demand of land uses without providing more parking than necessary.

O22-12 (Plan SB GPU): Comment noted.

O22-13 (Plan SB GPU): Comment noted. Please see revised text in the Economic and Fiscal Health Element reflecting the suggested language for consideration by decision-makers.

O22-14 (Plan SB GPU): Comment noted. Please see revised text in the Economic and Fiscal Health Element reflecting the suggested language for consideration by decision-makers.

O22-15 (Plan SB GPU): Please see text edit to Policy EF17.2 (Arts and Culture/Master Plan).

O22-16 (Plan SB GPU): Please see text edit to Policy ER6.6 (Solar Energy).

O22-17 (Plan SB GPU): Comment noted.

O22-18 (Plan SB GPU): References to “traffic calming” will be eliminated from the proposed circulation section of the General Plan.

O22-19 (Plan SB GPU): This policy is not intended to be a program, rather a direction to look for opportunities that will stimulate economic and pedestrian activity within the Downtown. The policy was developed because of comments from community members requesting more experiences where the pedestrian space includes the street. The suggested substitute language serves the same purpose.

O22-20 (Plan SB GPU): Comment noted.

O22-21 (Plan SB GPU): Comment noted. The existing Circulation Element directs the creation of a Parking Master Plan. This existing policy is not proposed to change. The current parking requirement for Downtown residential development is 1 space per unit. The parking maximum policy would limit developers to providing only the required amount of parking.

O23, Santa Barbara For All (April 27, 2010)

Response to Organization Letter # O23, Santa Barbara For All (April 27, 2010)

O23-1 (Plan SB GPU): Thank you for your comments, which will be forwarded for decision-maker consideration.

O23-2 (Plan SB GPU): Comments noted. The Land Use and Housing Elements of the draft General Plan Update would work in concert to guide new housing development. These two elements are coequal elements of the new General Plan, therefore, there may not be the need to repeat or relocate Land Use Element policies to the Housing Element. Both the Land Use and Housing Elements will work in concert to focus new residential growth toward commercially zoned areas Downtown which are proposed for redesignation as a Commercial/High Density (27-34 du/acre) land use. The draft General Plan Update contains policies which balance protection of key City resources such as views and historic structures with provision of new housing. However, where more restrictive height limits are applied, they are proposed to be targeted to protect key resources and not applied universally. Exceptions for taller structures may also be provided, where appropriate, for projects which provide community benefits such as affordable housing. Please see proposed additional Land Use Element Implementation Action LG13.4 (Fourth-Story Allowance in Commercial Zones).

O23-3 (Plan SB GPU): Comments noted. The primary recommended housing policy emphasis is to encourage workforce housing in smaller buildings through the adoption of the Average Unit Size Ordinance, a rental/employer housing overlay, and reduced residential parking requirements. These densities are reflected in the General Plan land use designations section of the General Plan Update and in the Housing Element.

The density program to address rental and employer housing at the higher densities and FARs will be developed and implemented soon after the Council adopts the Plan. Staff agrees that the for sale residential development standards need further work in order to ensure that plan objectives are being met. We agree that Policy LG 13 will take more time to thoroughly study and implement.

An alternative policy is also under consideration for a new base density for the high density areas in a range of 27 to 45 dwelling units per acre, in conjunction with the restriction of unit sizes. In addition, a policy is under consideration for a higher density range (46-60 dwelling units per acre with a supermajority vote and community benefit findings) for projects that demonstrate significant Community Benefit, such as the adaptive reuse of an historic structure, rental apartments with 3 or more bedrooms, or projects with a substantial percentage of affordable units. In addition, a 50% increase for rental and employer housing projects is being considered within designated target areas of the Downtown, Haley/Cota Street corridors, and the Milpas Street corridor.

The initial General Plan Update policies would go into effect upon adoption; however, there will be substantial additional work in subsequent implementation phases such as the amended Variable Density Ordinance

O23-4: Comment noted. Air Quality Mitigation Measure MM AQ-1 requires the City to track State progress on reducing diesel emissions. In addition, please see the amendments to MM-AQ-1 addressing closed air circulation systems for all new residential development within 250 feet of US Highway 101. However, absent State progress on reducing diesel emissions, closed circulation systems alone would not be expected to fully mitigate temporary air quality impacts due to open windows. . Given the presence of the Union Pacific Railroad tracks, Mission Creek, freeway landscaping, on- and off-ramps, and other freeway corridor uses, the temporary 250-foot buffer would not remove substantial amounts of residential development potential from the City's land inventory.

O23, Santa Barbara For All (Continued)

O23-5: Comments noted. Please note that the EIR analysis has clarified that potential future growth under the *Plan Santa Barbara* scenario could almost double the number of intersections in the City functioning below LOS C prior to implementation of proposed mitigation measures.

O23-6: Comments noted. Please be aware that the estimated range of 60-80 new taller buildings applies to the 2,878 units forecast to be constructed within the core commercial mixed-use development areas under the Additional Housing Alternative, not the *Plan Santa Barbara* project scenario. As discussed in Section 10.6.3 (Additional Housing Alternative) of the EIR, this projection assumes that 20-40 units could be accommodated in each new building. Based on recent taller development projects, the number of new units in each new three- to four-story building has ranged from roughly 15 to 30 units. If 80 new buildings each accommodate an *average* of 20 units, then 1,600 of the potential new 2,878 units in the core commercial mixed-use development areas under the Additional Housing Alternative would be located in larger structures, and over 1,200 units could have to be accommodated in smaller projects (e.g., duplexes, second units, smaller two-story structures, etc); the areas most subject to proposed policies are unlikely to be able to support this type of development. In addition, while the overall level of 2,878 units of residential growth may not come to pass, the EIR is required to provide a reasonable worst case analysis of impacts based on this set of policies and assumptions. Finally, the EIR identifies the potential for impacts associated with a change in community character, and concludes that the impact would be less than significant.

O23-7: Comments noted. Please see responses O23-1 through -6 above. The City looks forward to working with Santa Barbara For All through adoption and implementation of the General Plan Update.

O24, Santa Barbara For All (May 5, 2010)

Response to Organization Letter # O24, Santa Barbara For All (May 5, 2010)

O24-1: Thank you for your comments, which will be forwarded to decision-makers. In regards to the effectiveness of Transportation Demand Management, while it is true that the higher densities and increased provision of housing in the Additional Housing Alternative would most effectively match new growth with TDM, it is important to remember that the *vast majority* of the congestion reduction benefits identified in the EIR for TDM are derived from reductions in existing traffic volumes and that new growth adds a relatively minor amount of trips to the roadway network when compared to existing traffic volumes. Therefore, the TDM program is relatively transferable between alternatives and would only lose a degree of effectiveness when applied to other alternatives. Further, while new housing, particularly in the Downtown, would almost certainly help reduce long distance commuting and associated congestion, the Transportation Model was unable to fully isolate this variable so these anticipated benefits could not be quantified.

O24-2 (Plan SB GPU): Comments noted. Please see responses O23-1 through O23-6.

O24-3 (Plan SB GPU): Comments noted. Major implementation measures such as adoption of form-based codes will entail an open public process with substantial opportunities for input.

O25, Santa Barbara Trust for Historic Preservation (May 14, 2010)

Response to Organization Letter # O25, Santa Barbara Trust for Historic Preservation (May 14, 2010)

O25-1: Thank you for your comments.

O25-2: Comments noted. Please see revised text in EIR Section 10 (Heritage Resources).

O25-3: Comment noted. As set forth in the EIR, the City's extensive archaeological resource protection policies and programs as referenced in EIR Section 10.2 (Applicable Plans & Policies) ensure that subsurface archaeological remains will be identified and characterized, protected where appropriate and feasible, and salvaged where avoidance is not possible. The City's programs, policies, and approach are consistent with the requirements of CEQA Section 15064.5, and the City MEA Guidelines for the Assessment of Archaeological Resources and Historic Sites and Structures were developed with extensive input from the local community and experts. The City is unaware of any recent development projects near El Presidio that have resulted in significant impacts to archaeological resources. Please also refer to EIR response to comment O3-10.

O25-4: Comment noted. Please see responses A2-2, A2-4, and A2-7.

O25-5: Comment noted. Please see revised text. While the El Pueblo Viejo (EPV) Design District is clearly centered around State Street, the heart of the City's historic resources are concentrated around El Presidio.

O25-6: Comment noted. The EIR provides substantial analysis and discussion of the effectiveness of the City's existing policy framework and design review and environmental review processes to address visual and aesthetic impacts, as well as the role of proposed *Plan Santa Barbara* policies in further reducing such potential impacts through improved design review, measures limiting building size, bulk, and scale, and identification/preservation of key views. In addition, the EIR provides recommended mitigation measures which could further reduce such impacts.

O25-7: Comment noted. With application of existing policies and proposed *Plan Santa Barbara* policies, no significant impact has been identified with regard to open space within the Downtown core. Please see the revised text of MM VIS-1 (Open Space Protection and Restoration), which now includes El Presidio as an additional example of an important public open space and viewing location which should be protected Downtown.

O26, Upper East Association (April 18, 2010)

Response to Organization Letter # O26, Upper East Association (April 18, 2010)

O26-1: Comments noted. These comments generally apply to the contents of the General Plan and not the adequacy of the EIR. These comments will be considered by City decision makers during the adoption process.

O26-2 (Plan SB GPU): Comment noted. Proposed policies LG13.2b (Community Character/FAR, *previously numbered CH15*) and LG14 (Historic Structures, *previously numbered CH10*) both speak to developing standards with protection of historic resources or single family areas. Please see edits to LG13.2b and c. (Floor Area Ratios and Form-Based Codes) to add areas that are adjacent to single family zoned areas.

O26-3 (Plan SB GPU): Thank you for your comment. Comment noted.

O26-4 (Plan SB GPU): Comment noted. General Plan Land Use Policy LG17, Sustainable Neighborhood Planning (*previously numbered LG15*), encourages neighborhoods to preserve and enhance the sense of place, provide opportunities for healthy living, and accessibility, while reducing the community's "carbon footprint". The shape and focus of future Sustainable Neighborhood Plans will vary as they are developed for each unique area of the City, and for the Upper east and State Street, additional zoning tools may be considered at that time if appropriate (please see Policy LG 17 – Sustainable Neighborhood Planning).

O26-5: Comments noted. Please note that the Santa Barbara Transportation Model does not project significant increases in surface street traffic volumes for the area southeast of Sola Street. For example, traffic volumes on Laguna Street are projected to grow by less than 9% over this 20-year period (please refer to EIR Figures 16.2 and 16.5). Note: Volumes are projected to grow from 17,320 to more than 23,000 on the two-lane segment of State Street.

O26-6 (Plan SB GPU): Comment noted. The City currently does have regulatory tools for institutional uses in residential zones in The Zoning Ordinance. Most of the Upper East neighborhood has a single family zone designation. The uses permitted in single family zones are identified in the Santa Barbara Municipal Code (SBMC) Section 28.15.030. Institutional uses are allowed with a Conditional Use Permit (CUP) or a Performance Standard Permit. New institutional uses proposed in a single family zone require a CUP that is a discretionary action. CUPs define the permitted use and site improvements and have specific findings (SBMC28.94.020) required by the Planning Commission. In addition, SBMC 28.15.085 spells out the regulations for non-residential buildings, structures and uses (e.g. double setbacks, lot coverage limitations, design review approval). When the approved program of a CUP is changed, either a finding of substantial conformance, an amended CUP, or new CUP would be required. A new land use policy has been added as LG12 to address Institutional uses and to strengthen the CUP standards and findings in the zoning ordinance for stronger consideration when permitting institutional uses in residential zones.

However, as noted by the comment, there are many long established institutional uses that are non-conforming and that do not have a CUP. This is a challenge for the City in regulating established non-conforming uses or permitting changes of use or intensity for the same or another institutional use when the conditions of the CUP were never defined. This needs to be considered when reviewing the CUP section of the zoning ordinance. The four items identified in the comment would be considerations when reviewing institutional uses and implementing the new Institutional CUP policy.

O26-7 (Plan SB GPU): Comment noted and will be forwarded to decision-makers. It is noted that the relaxation of second unit standards and specific locations where any reduced limitations would be carried out, are

O26, Upper East Association (Continued)

factors that still need to be worked out at a future phase of implementation. This implementation action would be carried out through a public process, and we look forward to working with the Upper East neighborhood on your specific concerns.

With respect to shared use of resources and facilities within neighborhoods, please see additional text as part of proposed Policy Implementation Measure LG17 (Sustainable Neighborhood Plans).

O27, Fred Sweeny, Upper East Association (May 14, 2010)

Response to Organization Letter # O27, Fred Sweeny, Upper East Association (May 14, 2010)

O27-1: Thank you for your comments. Improved Transportation Demand Management (TDM) and changes in City parking operations are proposed as the only cost-effective way to address existing and anticipated future congestion at City intersections. Although the City does not anticipate that most Downtown employees would walk more than ¼ mile outside of the Downtown core to park on Upper Eastside streets, residential parking permit programs are available as needed to address this issue. Improved TDM and parking management programs are not intended to be punitive, but will be utilized to broaden transportation choices available to commuters, avoid costly and environmentally damaging intersection widening projects, and conserve scarce City funds.

O28, Fred Sweeny, Upper East Association (May 17, 2010)

Response to Organization Letter # O28, Fred Sweeny, Upper East Association (May 17, 2010)

O28-1: Thank you for your comments. Please see response O27-1.

INDIVIDUAL LETTERS

I1, John Ackerman (May 16, 2010)

Response to Individual Letter # I1, John Ackerman (May 16, 2010)

I1-1: Thank you for your comments.

I1-2: Comments noted. EIR Section 11.1.6 (Hydrology and Water Quality/Existing Setting/Coastal and Marine Water Quality) and Impact HYDRO-3 (Coastal and Marine Water Quality) and Section 15.1.2 (Public Utilities/Existing Setting/Wastewater Treatment) and Impact PU-2 (Wastewater Collection and Treatment) discuss nearshore marine water quality, including the effectiveness of current treatment processes in relation to disease-resistant organisms and the discharge of treated effluent into nearshore waters. The consultant team producing this analysis includes a water quality specialist and toxicologist with substantial experience in effluent disposal and related water quality issues. Revised text describing production and disposal of biosolids has been added to Section 15.1.2 (Public Utilities/Wastewater Treatment).

I2, Gil Barry (April 2, 2010)

Response to Individual Letter # I2, Gil Barry (April 2, 2010)

I2-1 (Plan SB GPU): Thank you for your comments.

I2-2 Comment noted.

I2-3 (Plan SB GPU): Comment noted. Please see EIR Sections 4.3 (Future Growth Assumptions) and 4.4 (Extended Range or Full Build-Out Under *Plan Santa Barbara*) for discussion of build-out assumptions used to consider impacts of longer-range growth in 2050 and beyond and full build-out under the Land Use Element Map and zoning. This provides a reasonable worst-case analysis of impacts as required by the California Environmental Quality Act (CEQA). Also please see Responses O4-2, A12-7, and A12-8.

I2-4 (Plan SB GPU): Comment noted.

I3, Gil Barry and Paul Hernadi (May 3, 2010)

Response to Individual Letter # I3, Gil Barry and Paul Hernadi (May 3, 2010)

I3-1: Thank you for your comments. Differences in projected build-out between the proposed project and No Project alternatives are largely a result of proposed changes to the City's variable density ordinance. These changes would facilitate increased density in the Downtown and within the proposed commercial/high density zones under the proposed project. Please also see response A12-8.

In regard to the differences in assumptions by zones between alternatives, please refer to EIR Sections 4.3.3 and 4.3.4 (Residential Development Assumptions), Tables 4.7 (Existing City Land Uses and Relationship to the MODA) and 4.8 (Assumptions for Distribution of Potential Future Growth by Land Use) as well as Section 5, Description of Alternatives (including Table 5.1- EIR Alternatives: Summary of Policy and Growth Assumptions for EIR Analysis), and Table 22.1 (Summary of Growth and Policy Assumptions). Appendix D, Representative Distribution Assumptions for Future Growth provides additional details on this matter.

I3-2: Thank you for your comments. Please see response to comment O4-2.

I3-3: The freeway buffer of 250 feet is anticipated to have minimal effects on long-term build-out due to the presence of landscaping, the railroad, and roads within these setbacks, the relatively limited amount of residential lands affected, and the expected interim nature of these setbacks. Please see also response A9-2.

I3-4: With respect to retained commercial component in mixed-use development, the existing commercial component is part of the baseline conditions. Build-out assumptions project net increases and do not figure in existing retained uses.

I4, J. Brown (April 27, 2010)

Response to Individual Letter # I4, J. Brown (April 27, 2010)

I4-1 (Plan SB GPU): Thank you for your comments. Please see EIR discussions of fire issues (EIR Sections 9 and 14), traffic and circulation (EIR Section 16), water use (EIR Section 15), lighting (EIR Section 13), and affordable housing (Section 19). The draft General Plan Update also proposes policy updates that address each of these issues, as well as parking, density, building scale and height, and Floor Area Ratios. For sign issues within City jurisdiction, please refer to the City Sign Ordinance and Design Review Guidelines on the City web site (www.SantaBarbaraCA.gov). For U.S. Highway 101 design issues, please see existing City *Highway 101 Santa Barbara Coastal Parking Design Guidelines*, and for Highway 101 improvements, access the SBCAG web site (www.SBCAG.org). The City looks forward to working with the County, interested organizations, and individuals to ensure that new development along Coast Village Road is of high-quality design that appropriately minimizes impacts.

I4-2 (Plan SB GPU): Comments noted. Please see response O17-4. Parking overspill appears largely confined to unusual peak events and new development must comply with City parking standards. With respect to enforcement, City parking officers are responsible for enforcing City ordinances within City boundaries. The County is responsible for enforcement of County ordinances within unincorporated areas.

I4-3 (Plan SB GPU): Comment noted. Please see response O17-4. As noted in this response, it is generally neither feasible nor desirable to design parking based on peak events, as this leads to excessive underutilized parking areas with associated secondary environmental consequences, such as from excessive paving. The goal of the City parking standards is to accommodate average peak commercial parking demand, and not that associated with a weekly farmers market or low-frequency events such as car shows which are of benefit to the entire community. Permits for such events are generally structured to manage parking to minimize overspill issues through provision of signs and/or monitors to direct parking to established streets and lots to the extent feasible.

I4-4 (Plan SB GPU): Comments noted. The EIR provides a general, citywide evaluation of issues such as fire and safety response (EIR Section 14), circulation (EIR Section 16), and design aesthetics (EIR Section 13). The General Plan Update also identifies a program to address more specific Montecito area issues. Please see GPU Land Use Element, Policy LG13-Community Character, and Implementation Action 13.1.2-Design Overlays/Coast Village Road. Under this program, the City would coordinate closely with the County, Montecito Association, Coast Village Road Business Association, and interested neighbors on future development of specific guidelines to address development along Coast Village Road. The City looks forward to working with the community on this and other development related issues.

I5, J. Campanella (May 13, 2010)

Response to Individual Letter # I5, J. Campanella (May 13, 2010)

I5-1 (Plan SB GPU): Comments noted. Thank you for your input and participation in the process. Your comments will be forwarded for decision-maker consideration.

I5-2 (Plan SB GPU): Comments noted.

I5-3 (Plan SB GPU): Comments noted. Concerns about the financial feasibility of providing the workforce units will be forwarded to the City Council. The direction with respect to densities, units sizes, and height limitations (4th stories) will be decided on as part of the adoption process for the General Plan Update.

I5-4: Comments noted. Regarding EIR and overall objectives, these were defined by the City Council at the outset of the *Plan Santa Barbara* process and may be found in Section 3.2 of the EIR. Final decisions on implementation tools will be made by City Council following Final EIR certification as part of the Plan approval process. New policy direction for protection of historic resources has been incorporated into the Land Use and Housing Elements. See refinements to LG 14.5 and HR5 to further address buffering of historic resources, and establishment of historic districts. The target areas for higher density will be decided by the City Council.

I5-5 (Plan SB GPU): Comments noted. Please see Section 19 (Population and Jobs/Housing Balance) of the EIR which provides an analysis of the project jobs/housing balance for *Plan Santa Barbara* as well as for each alternative studied. It should be noted that the EIR finds that development under *Plan Santa Barbara* would result in a rough parity between new jobs and new housing over the next 20 years. However, the EIR does not identify an improvement in the jobs/housing balance under the proposed project and projects a substantial shortfall in affordable housing production required to meet increased demand generated by new job growth.

#I6, C. Cintas (May 17, 2010)

Response to Individual Letter #I6, C. Cintas (May 17, 2010)

I6-1 (Plan SB GPU): Thank you for your comments. Please see the General Plan Update, Chapter 2, Sustainability Framework, which provides sustainability definition and principles for equity, environment, and economy that underlie the entire General Plan Update.

Regarding the local City versus regional perspective, the current process and focus is to update the General Plan for the City, which is the area for which City government has responsibility and authority. However, the proposed Plan recognizes the importance of the regional context, and includes many references to regional coordination for effective implementation of policy objectives, and consistent with recent State legislative mandates. A few of these measures include a Goal (Regional Approach), Introduction to the Elements Section that includes a section on Regionalism; Policy LG9 (Regional Planning) and Implementation Action LG 9.1 (Regional Land Use/Transportation Plan); OP2.3 (Regional Open Space); EF 21 (Regional Economic Strategy); EF23 (ER6 (Local and Regional Renewable Energy Resources); ER24 (Regional Agriculture); H22 (Work to Solve Regional Jobs/Housing Imbalance); C2 (Regional Transportation and Commuter Transit); PS6 (Regional Cooperation on Water Conservation); PS7 (Solid Waste Management Programs); PS12 (Emergency Workforce).

I6-2 (Plan SB GPU): Comments noted. Please see responses C1-2 regarding transit improvements. Please be aware that the City is currently considering the potential for dedicated transit lanes along Upper State Street and that new High Occupancy Vehicle Lane improvements proposed for U.S. Highway 101 from the City south to Ventura would also serve transit.

I7, Paul and Claudia Cook (March 18, 2010)

Response to Individual Letter # I7, Paul and Claudia Cook (March 18, 2010)

I7-1: Thank you for your comments. The current General Plan Land Use Map designation for the parcels is Offices with an R-3, Multiple-Family Residence Zone classification. The proposed General Plan Land Use Map amendment for these parcels is to designate them as Office High Density. If Council adopts this land use designation for these parcels, a future implementation action would be to rezone the parcels from R-3, to R-O, Restricted Office Zone that would allow a mix of offices and residential development consistent with existing land use patterns.

I8, Norbert Dall, Dall and Associates (April 27, 2010)

Response to Individual Letter # I8, Norbert Dall, Dall and Associates (April 27, 2010)

I8-1: Comments noted. The General Plan update is a broad policy document and 20-year long-term plan for development citywide. The focus of this update is to develop a Sustainability Framework for the General Plan and all recommended elements along with a new Land Use Element, Land Use Map, and Housing Element. Updated policies are to be incorporated with other elements that currently exist and other elements will be further updated in the future. Until those elements are developed, the existing elements would be operational along with new policies recommended to be incorporated to those respective elements.

The focus of this update is not to do a qualitative and technical analysis of individual single-family zoned and low-density residential general plan designated parcels such as your client's. Nor have any single-family zoned parcels been identified for the City to "take" for use as public open space.

Policies and implementation actions in general are measures the City could take to achieve long-term goals, such as preservation and dedications of public open space. Furthermore, the current Open Space Element, adopted in 1973 provides for the protection of "significant open and natural landforms through and around the community."

The Shoreline is identified in the existing Conservation Element as one of the important areas of open space and visual features. The existing Open Space Element describes the shoreline, harbor, and waterfront areas as key aesthetic assets which provide diverse recreational opportunities and passive enjoyment of the sea, sand, and scenic views. The importance of this resource is reflected by the existing identification of "unique visual sensitivity" on the Scenic Resources Map."

Please refer to the responses of your more than 150 comments you submitted regarding use of your client's parcel. The General Plan Land Use designation that would apply to El Camino de La Luz is Sub-Urban, Low Density Residential, Maximum 3 dwelling units per acre, consistent with the land use designation that applies to the parcel today.

I8-2: Comment noted.

I8-3: Comment noted. A proposed final Environmental Impact Report and General Plan document will be available for public review prior to certification of the EIR by the Planning Commission and adoption of the General Plan by City Council. Staff has reviewed the proposed changes to the project and the environmental review. Staff has concluded that none of the changes to the project or the environmental review constitute significant new information as that term is defined in CEQA Guideline 15088.5 that would require recirculation of the draft EIR. The proposed revisions to the project description do not result in new significant environmental impacts. Further, these changes would not require the addition of substantially different mitigation measures than were previously identified in the draft EIR. The changes merely clarify or amplify the discussion and analysis contained in the draft EIR. Therefore, recirculation of the revised draft EIR is not required under CEQA.

I8-4: The purpose of the Suitable Sites Inventory is to analyze whether the City's proposed General Plan residential development potential is adequate to meet the housing needs identified in the 2008 Regional Housing Needs Plan prepared by SBCAG. It is intended to assess whether the City can accommodate the Regional Housing Needs Allocation (RHNA). The Suitable Sites Inventory does not include all developable parcels nor does it need to. The Inventory of itself does not in any way render a parcel unbuildable or eliminate development potential by the fact that it is not on the list.

I8, Norbert Dall, Dall and Associates (Continued)

A number of single-family parcels with slopes in excess of 30% or greater and/or with geologic, biological or other constraints were removed from the database. This is explained beginning on page 289 of the Draft Housing Element.

I8-5: Comment noted.

I8-6: The General Plan Update is a process, with refinements made at each stage, and it is also an iterative process between the Draft General Plan and EIR, as discussed in the State General Plan Guidelines. Numerous opportunities for public comment are afforded throughout the process. Until decision-makers have completed their review and provided input on recommended policies and measures in draft documents, and until the document is adopted by City Council, it may continue to be refined. See response I8-3.

I8-7 (Plan SB GPU): Comment noted. See response I8-1.

I8-8: Comment noted. Figure 13.1 is a 1-inch to 3,000-foot scale, 11 x 17 map intended for citywide display purposes. The map is intended as a general guide to sensitive resources. Its application to individual parcels would be considered on a site-specific basis based on more detailed review of specific site characteristics. However, it is inaccurate to characterize elevations above 55 feet as being precluded from public view. The shoreline is not a static feature and views available from the beach along this section of the City's coast vary substantially depending upon the viewing location, tides, etc. For example, beach goers can view far more extensive areas of the bluffs and bluff top features such as trees and structures from points along this section of coastline. Views of the bluff face and bluff top features are also generally far more prevalent during the dozens of minus tides which greatly affect the width of the beach available for public use and the angle of public views of the bluff face and bluff top features. Views of the bluff face also consider offshore users, including several popular surf breaks along the Mesa bluffs, as well as offshore boaters and kayakers, etc.

I8-9 (Plan SB GPU): Comment noted. See response I8-1.

I8-10: Comment noted. The EIR primarily addresses sea cliff retreat issues in Section 8, Geologic Hazards and provides a more general long-term disclosure of bluff retreat issues as they relate to global climate change in Section 18.

Section 8.1.5 (pages 8-10 to 8-11) provides relatively detailed discussion of General Plan-level issues along the City's roughly four miles of coastal bluffs, including a discussion of applicable City Local Coastal Program and State Coastal Act guidance. This includes a brief discussion of the findings of a recent City-prepared study in support of an update to the City Master Environmental Assessment (MEA) which indicates that overall guidelines for annual generalized bluff retreat rates should be increased to 12 inches per year from the current annual average mandated by policy of 8 inches per year.

The methodology outlined by Johnsson (2002) was generally utilized for the generation of a proposed sea cliff retreat line (SCRL) within a revised draft MEA, including steps to identify the top bluff edge: identify the general global stability conditions; and identify long-term erosion rates over a period of at least 50 years, evaluate short-term or episodic erosion rates; and apply a safety factor for setbacks if necessary. The global slope stability of sea cliffs along the Santa Barbara coastline was qualitatively evaluated at select locations along the project area coastline. The evaluation also was based on professional and research experience and a review of literature of mapped landslides along the Santa Barbara coastline. Detailed quantitative global slope stability evaluation was beyond the scope of this study to identify a regional SCRL. Site-specific quantitative evaluations may find that global slope stability may be less than or greater than the assumed global bluff instability

I8, Norbert Dall, Dall and Associates (Continued)

zone identified in this study. The highest erosion or retreat rate documented by Norris (1986, personal communication 2006) for sea cliffs within the City boundaries was approximately 12 inches per year. However, long-term erosion rates are on average 8 inches per year.

Additional sea cliff setback due to the effect of erosion on the sea cliff was calculated by multiplying the design life (75 years) by the identified documented highest episodic erosion rate (12 inches per year). Because rates of sea cliff erosion may translate along the coast (rate of erosion moves from littoral cell to another), the highest (most conservative) documented rate of sea cliff erosion (12 inches per year) has been utilized for generating the sea cliff retreat line.

This study was prepared by licensed geologist and was also peer reviewed by additional licensed geologists. Therefore, its utilization as a basis for CEQA analysis and for programmatic level mitigation measures within an EIR is both supported by sufficient evidence and consistent with CEQA mandates to employ a reasonable worst-case analysis and identify mitigation measures required to reduce any impacts identified.

Further, as explicitly stated in adopted City policy and in mitigation measure MM GEO-1, the use of a revised figure of 12 inches per year to determine the overall 75 year retreat line is to be used to screen individual projects to determine which are required to prepare project specific analysis. Further, this proposed amendment to the 75-year retreat line does not directly account for the newest, albeit preliminary information on the potential effects of sea level rise on bluff retreat as discussed below.

I8-11: Comment noted. As discussed above, Section 8 of the EIR addresses sea cliff retreat and designs proposed mitigation measures based on a recently prepared City-specific qualitative study of overall bluff retreat, not that of individual parcels or even particular streets. However, as required by recent amendments to CEQA, the EIR also discloses the potential longer-term implications of accelerated coastal bluff retreat. These studies, as endorsed by the State of California, constitute the most current available information on the possible implications of accelerated bluff retreat upon coastal properties in the City of Santa Barbara. However, the EIR is careful to characterize this data as general in nature and as such, it is provided in the interest of full disclosure and to meet State requirements that such potential climate change hazards be disclosed. The impact analysis in Section 8 along with the currently required mitigation is based on a technical analysis of historic bluff retreat and applies a conservation recommendation for setbacks (based on 12 inches per year).

As such, it would be inappropriate for the City to alter or abandon the EIR analysis as suggested.

I8-12 (Plan SB GPU): Comment noted. See response I8-1.

I8-13: Comment noted. See response I8-4.

I8-14: Comment noted.

I9, Norbert Dall, Dall and Associates/Matrix (May 17, 2010)

Response to Individual Letter # I9, Norbert Dall, Dall and Associates/Matrix (May 17, 2010)**Draft General Plan Update**

I9-1 (Plan SB GPU): Comment noted. All documents have been made available to public and decision-makers. The *Plan Santa Barbara* website has been set up specifically to keep the public informed about the *Plan Santa Barbara* process.

I9-2 (Plan SB GPU): Comment noted. See response I9-1.

I9-3 (Plan SB GPU): The City's boundaries, including the seaward boundary, are shown on the Official Public Street Map of the City of Santa Barbara and the Annexation Index Map of the City of Santa Barbara. The General Plan Map has been edited to reflect that City boundaries extend into the Santa Barbara channel.

Developing specific structural alternatives for City-County organizations are not in the scope of the General Plan framework further than developing policies that organizations work together on regional issues or issues/services that overlap.

I9-4 (Plan SB GPU): The Draft General Plan Sustainability Framework discussion describes the sustainability approach to the General Plan update. The entire *Plan Santa Barbara* process has involved defining with decision-makers and the community what sustainability is for the city of Santa Barbara. As part of the City's future implementation program, it is expected that the Adaptive Management Plan will be further defined to specify which indicators should be evaluated for impacts on resource use as well as sustainability.

I9-5 (Plan SB GPU): Comment noted. The new General Plan Map land uses designations were developed on a parcel-based method and follow parcel lines.

I9-6 (Plan SB GPU): Comment noted. The Shoreline General Plan land use designation is not intended to include the privately owned bluff top residential properties.

I9-7 (Plan SB GPU): Comment noted.

I9-8 (Plan SB GPU): The purpose of the Suitable Sites Inventory is to analyze whether the proposed City General Plan residential development potential is adequate to meet the project housing needs identified in the 2008 Regional Housing Needs Plan prepared by SBCAG. It is intended to assess whether the City can accommodate the Regional Housing Needs Allocation (RHNA). The Suitable Sites Inventory does not in any way render a parcel unbuildable or eliminate development potential by the fact that it is not on the list.

A number of single-family parcels with slopes in excess of 30% or greater and/or with geologic, biological or other constraints were removed from the database. This is explained beginning on page 289 of the Draft Housing Element.

I9-9 (Plan SB GPU): As part of the City's future implementation program, it is expected that the Adaptive Management Plan will be further refined to include quantifiable standards.

I9-10 (Plan SB GPU): Comment noted. See response I9-5.

I9-11 (Plan SB GPU): The Project Compatibility Analysis purpose, considerations, and procedures are codified in the city of Santa Barbara Municipal Code (SBMC) chapters of Historic Resources and Architectural Board of Review. These sections can be found in SBMC Section 22.22.145 and SBMC Section 22.68.045. The development projects subject to these sections are defined in the respective codes.

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

I9-12 (Plan SB GPU): Comment noted. The environmental review and standards of the recently adopted Neighborhood Preservation Ordinance amendments is not within the scope of the General Plan update. The appeal process schedules for discretionary projects are not within the scope of the General Plan update.

I9-13 (Plan SB GPU): The Pedestrian Master Plan was adopted by the City Council by resolution 06-065 on July 18, 2006.

I9-14 (Plan SB GPU): The City has various guidelines that apply to the various discretionary review bodies or to a specific geographic location in the City. All guidelines are found on the city of Santa Barbara website.

I9-15 (Plan SB GPU): The Hillside Design District is delineated on the maps labeled “Hillside Design District” which are part of SBMC22.68.

I9-16 (Plan SB GPU): The Sustainability Framework approach to the General Plan update includes broad policies towards sustainability citywide, including the Airport. Addressing further specific sustainability of the Airport through 2030, 2050, or 2100 is not within the scope of this General Plan update.

I9-17 (Plan SB GPU): Comment noted. The bulleted list of *general* broad desired neighborhood qualities is representative of the current General Plan update process as well objectives of the 1964 General Plan. The Plan development has considered extensive public comment received throughout the Plan process

I9-18 (Plan SB GPU): The draft General Plan update is a broad policy document. A quantitative analysis of specifically the El Camino de la Luz hillside and coastal bluff/sea cliff landform stability is not within the scope of the draft General Plan document. Please also see response I8-8, I8-10 and I8-11.

I9-19 (Plan SB GPU): Comment noted. Grading policies relative to slopes throughout the City are found in the existing Conservation and Seismic Safety-Safety Element. Identifying specific grading that has or has not occurred in specific geographic areas of the City is not within the scope of the current phase of the General Plan update. The current focus is on an updated Land Use and Housing Elements as well as new policies to be included in other elements of the General Plan to be updated at a later time. Until the other elements are updated, the existing elements are applicable. At a future date when the Seismic Safety and Safety Element is updated, geologic issues will be further addressed.

I9-20 (Plan SB GPU): See edits to General Plan document, Land Use Element, Neighborhood Issues..

I9-21 (Plan SB GPU): Comment noted. Components of the 2007 Mesa Concept Plan will be considered at the time that a Sustainable Neighborhood Plans is further defined for the Mesa (LG17.)

I9-22 (Plan SB GPU): See response I9-21. The lack of a Sustainable Neighborhood Plan would not in of itself delay or impede the development of a single-family zoned parcel.

I9-23 (Plan SB GPU): Comment noted.

I9-24 (Plan SB GPU): Comment noted. The final document will include the citywide percentages of land area by land use designation category. The individual charts for the neighborhoods will be removed from the document.

I9-25 (Plan SB GPU): Living within our resources is a broad general goal in both the existing and proposed General Plan. General policies for City acquisition of private parcels would be for the purpose of providing affordable housing, community buildings, or for open space and parks. See General Plan Policies OP1.2,

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

OP2, OP1.4, OP1.5. A few examples of properties identified in the draft General Plan that could potentially be acquired someday in the future to serve a community purpose include the Clark Estate, the National Guard Armory, and the Army Reserve Building.

I9-26 (Plan SB GPU): Comment noted.

I9-27 (Plan SB GPU): Comment noted. The term “useable and well located open space” applies to both private and public open space.

I9-28 (Plan SB GPU): Comment noted.

I9-29 (Plan SB GPU): Comment noted.

I9-30 (Plan SB GPU): Comment noted.

I9-31 (Plan SB GPU): Comment noted.

I9-32 (Plan SB GPU): Many of the General Plan policies including those found in the Draft Housing Element call for incentives, including higher densities, for affordable housing projects. Policy H15 in the Housing Element specifically calls for encouraging secondary dwelling units in some appropriate single family neighborhood locations.

I9-33 (Plan SB GPU): Comment noted. See response I9-9.

I9-34 (Plan SB GPU): The adoption of Policy LG6 which calls for encouraging new residential units in the recommended High Density residential land use designations would not preclude the development of new single-family units on single-family lots. Please note that Policy H10 calls for encouraging the development of housing on vacant in-fill sites in residential zones.

I9-35 (Plan SB GPU): Comment noted. See proposed density program including text changes in the Land Use Element and Housing Element policies of the General Plan update. The actual operational details of an average density program would be part of future implementation. The City’s zoning ordinance would include the details and zoning classifications where applicable.

I9-36 (Plan SB GPU): Comment noted. Development of a revised TDR program is not within the scope of this phase of the General Plan update. At the time that that Council initiates the development of a revised TDR program, the operational terms, parameters, and methodology details would be identified.

I9-37 (Plan SB GPU): Comment noted.

I9-38 (Plan SB GPU): The General Plan update is a broad policy document. Your specific concerns for 1921-1925 El Camino de la Luz are not within the scope of the draft General Plan document.

I9-39 (Plan SB GPU): Comment noted.

I9-40 (Plan SB GPU): Comment noted.

I9-41 (Plan SB GPU): Comment noted. Major hillsides are discussed in the text of the existing Open Space Element which is not being amended at this time (except for incorporation of General Plan update policies). Major hillsides are shown on the Draft General Plan Parks and Open Space Map. LG16 is a policy for single-family zoned properties. Note that Implementation Action 16.2 discusses slope density standards that are applicable also in the R-2, two family zone.

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

I9-42 (Plan SB GPU): Comment noted.

I9-43 (Plan SB GPU): Comment noted. See edits to the General Plan Land Use Map.

I9-44 (Plan SB GPU): Comment noted. The current focus is on an updated General Plan Land Use Element and Map and Housing Element as well as new policies to be included in other Elements of the General Plan to be updated at a later time. Until the other elements are updated, the existing elements are applicable. The focus of Policy OP2 is for possible future acquisition of publicly owned or underdeveloped properties. At this time, no specific residential vacant privately owned parcels are recommended for public acquisition.

I9-45 (Plan SB GPU): Comment noted. See response to I9-25.

I9-46 (Plan SB GPU): Comment noted. The Park and Open Space Standards have not been developed as they are a recommended implementation action to be carried out in the future. This policy and corresponding implementation actions are relative to publicly owned open space, primarily City-owned or managed parks. See EIR Section 14.0 for more discussion on Parks and Recreation Services.

I9-47 (Plan SB GPU): See response I9-46.

I9-48 (Plan SB GPU): Comment noted. The General Plan update is a broad policy document. The Open Space Shoreline land use designation applies to public open space, and not private property. Your specific concerns for 1921-1925 El Camino de la Luz are not within the scope of the draft General Plan document.

I9-49 (Plan SB GPU): Comment noted. The level of detail that would define what areas of contiguous tracts of open space or important public views has not been defined. The General Plan is a 20-year document and further details of future implementation actions under OP1 and ER25.1 have not been identified.

I9-50 (Plan SB GPU): The program details for specific community gardens have not been developed nor any sites identified at this time. At the time Sustainable Neighborhood Planning occurs or when OP1.1 is implemented, individual neighborhoods could identify prime locations. The property owners would be involved in any decision to use a person's private property is developed as a community garden. It would be highly unlikely that a community garden would be established on any bluff top properties due to irrigation and erosion concerns.

I9-51 (Plan SB GPU): Comment noted. This suggestion is something that can be considered if and when an Open Space fee structure is set up for new development or redevelopment in the City.

I9-52 (Plan SB GPU): Comment noted. The existing Open Space Element is part of the recommended final General Plan update.

I9-53 (Plan SB GPU): Comment noted. The existing Parks and Recreation Element would remain part of the General Plan, with updated policies adopted as part of the *Plan Santa Barbara* GPU and incorporated as part of the Parks and Recreation Element. With the exception of recommended new policies, this element is not being updated in this phase of the plan but would be in the future. Section 18.0 of the EIR (Global Climate Change) and Section 8.0, Geologic Conditions discuss possible future erosion of the City's coastline that includes public facilities and parks. The EIR includes mitigation measure MM GEO-1 that calls for the development of a Shoreline Management Plan to identify, manage and to the extent feasible mitigate or reduce climate change-induced sea level rise impacts upon public facilities and private property along the City shoreline.

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

I9-54 (Plan SB GPU): Comment noted. See edits to map.

I9-55 (Plan SB GPU): Comment noted. By the time the draft General Plan is adopted by City Council, it will include the recommended goals for the Land Use and Housing Elements and an initial set of sustainability goals and updated policies for each of the other elements that are to be updated at a later time. These goals are a combination of existing General Plan goals, Council goals and community and decision-maker input as part of *Plan Santa Barbara*. As explained in the introduction to each of the elements, as “the City focuses its planning resources on the various separate elements of the General Plan, all of the goals, policies and implementation actions will also evolve.”

I9-56 (Plan SB GPU): Comment noted. A proposed final General Plan document will be available for public review prior to adoption by City Council.

I9-57 (Plan SB GPU): Comment noted. The scope of the current General Plan update is to develop a Sustainability Framework (also see response to I9-55) for the General Plan and all elements, and to update the Land Use and Housing Elements. The Council will review and approve an implementation program for adopted programs and schedule for future planning phases to update other elements of the General Plan.

I9-58 (Plan SB GPU): Comment noted.

I9-59 (Plan SB GPU): Comment noted.

I9-60 (Plan SB GPU): Comment noted. See Existing City *Sustainable Santa Barbara* program for City facilities and operations (www.SantaBarbaraCA.gov). See GPU Environmental Resources Climate Change Policies including ER1.1 Comprehensive Climate Action Plan (*previously numbered ER3*).

I9-61 (Plan SB GPU): Comment noted.

I9-62 (Plan SB GPU): Comment noted. The General Plan is a 20-year plan. Policy EF3 calls for the preparation of an economic development plan in the future. When this future plan is developed, it is highly likely that the desired areas for economic planning would focus on the commercial zones of the city.

I9-63 (Plan SB GPU): Comment noted.

I9-64 (Plan SB GPU): Comment noted. Decision-makers will consider these issues when approving the City's Capital Improvement Plan.

I9-65 (Plan SB GPU): Comment noted.

I9-66 (Plan SB GPU): Comment noted. Development impact fees as referenced in EF25 have not been developed at this time. If and when these are developed, a nexus study relative to the capital improvement costs of public facilities and services based on demands of the development will be part of the process for establishing fees.

I9-67 (Plan SB GPU): Implementation Action ER25.1 will be removed as a recommended measure because school districts and local jurisdictions cannot amend school fees. Fees are set by the State.

I9-68 (Plan SB GPU): Comment noted. The consistency analysis is not required to be contained in the General Plan. A comprehensive update of the existing Conservation element is not part of the current GPU update. The focus of this General Plan update is the Land Use Element, Land Use Map, and Housing Element,

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

with limited policy updates included in other elements such as the Environmental Resources policies. The Conservation Element as well as other elements will be further updated in future phases of planning.

I9-69 (Plan SB GPU): Comment noted.

I9-70 (Plan SB GPU): Comment noted. A General Plan is not required to define terms in common usage such as “greenhouse gases” which are generally accepted to refer to carbon dioxide, methane and related substances. Please refer to Sections 6 (Air Quality) and 18 (Global Climate Change) of the EIR for a more complete discussion.

I9-71 (Plan SB GPU): Comment noted. General Plan goals are often broad in nature and are not required (or encouraged) by State planning and Zoning law to be overly detailed. Thank you for your detailed suggestions regarding this matter. The City will consider these recommendations during the development of its Comprehensive Climate Change Action Plan (CCCAP).

I9-72 (Plan SB GPU): Comment noted. This broad General Plan goal is intended to provide general direction to the City to address and adapt to climate change with more detailed implementation to be set forth as part of the CCCAP identified in ER1.1. Thank you for your detailed suggestions regarding this matter. The City will consider these specific recommendations during the development of its CCCAP.

I9-73 (Plan SB GPU): Comment noted. This General Plan-level policy is intended to provide direction to the City to implement broad climate change goals to be further refined as part of the CCCAP. Editorial comments are noted and will duly be considered by City decision-makers; please see also response I9-70 regarding terms in common usage. Thank you for your detailed suggestions regarding this matter. The City will consider these specific recommendations during the development of its CCCAP.

I9-74 (Plan SB GPU): Comment noted. The draft General Plan provides one of the more detailed policy frameworks and accompanying environmental analyses yet performed at the general plan level in the State of California. No state laws or legislation suggest that the General Plan must provide Climate Action Plan level of detail. Such plans are clearly an implementation item under State law and the City has committed to a reasonable schedule for its adoption. Please refer to Section 23, Mitigation Monitoring and Reporting Plan and Table 23.1 in the EIR.

I9-75 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition. If the City adopts specific standards regulating GHGs, terms will be defined as required by statute. More detailed implementation will also be set forth as part of the CCCAP identified in ER1.1. Thank you for your detailed suggestions regarding this matter. The City will consider these specific recommendations during the development of its CCCAP.

I9-76 (Plan SB GPU): Comment noted. Details to be defined when a comprehensive Climate Change Action Plan is developed.

I9-77 (Plan SB GPU): Comment noted. See response to I9-73.

I9-78 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition. If the City adopts specific standards regulating GHGs, terms will be defined as required by statute. More detailed implementation will also be set forth as part of the CCCAP identified in ER1.1. Thank you for your detailed suggestions regarding this matter. The City will consider these specific recommendations during the development of its CCCAP.

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

I9-79 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition. If the City adopts specific standards regulating building materials, terms will be defined as required by statute. More detailed implementation will also be set forth as part of the CCCAP identified in ER1.1. Thank you for your detailed suggestions regarding this matter. The City will consider these specific recommendations during the development of its CCCAP.

I9-80 (Plan SB GPU): Comment noted. This policy is appropriately detailed for a General Plan and requires no further definition of terms. If the City adopts specific standards or implementing guidelines, terms will be defined as required by statute. More detailed implementation will also be set forth as part of the CCCAP identified in ER1.1. Thank you for your detailed suggestions regarding this matter. The City will consider these specific recommendations during the development of its CCCAP.

I9-81 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition. If the City adopts specific adaptation guidelines, terms will be defined as required by statute. More detailed implementation will also be set forth as part of the CCCAP identified in ER1.1. Thank you for your detailed suggestions regarding this matter. The City will consider these specific recommendations during the development of its CCCAP.

I9-82 (Plan SB GPU): Comment noted. General Plan goals are often broad in nature and are not required (or encouraged) by State planning and Zoning law to be overly detailed. Thank you for your detailed suggestions regarding this matter. The City will consider these recommendations during the development of its CCCAP.

I9-83 (Plan SB GPU): Comment noted. This policy is appropriately detailed for a General Plan and requires no further definition of terms. Comments are noted and will duly be considered by City decision-makers.

I9-84 (Plan SB GPU): Comment noted. General Plan goals are often broad in nature and are not required (or encouraged) by State planning and Zoning law to be overly detailed. Thank you for your detailed suggestions regarding this matter. The City will consider these recommendations during the development of its CCCAP.

I9-85 (Plan SB GPU): Comment noted. General Plan goals are often broad in nature and are not required (or encouraged) by State planning and Zoning law to be overly detailed. Thank you for your detailed suggestions regarding this matter. The City does not concur that City policy discourages micro production of energy. The City will consider these recommendations and any measures needed to ease micro production of energy at home sites during the development of its CCCAP.

I9-86 (Plan SB GPU): Comment noted. General Plan goals are often broad in nature and are not required (or encouraged) by State planning and Zoning law to be overly detailed. Thank you for your detailed suggestions regarding this matter. The City will consider these recommendations during the development of its CCCAP.

I9-87 (Plan SB GPU): Comment noted. General Plan goals are often broad in nature and are not required (or encouraged) by State planning and Zoning law to be overly detailed. Thank you for your detailed suggestions regarding this matter. The City will consider these recommendations during the development of its CCCAP.

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

I9-88 (Plan SB GPU): Comment noted. A General Plan is not required to define terms in common usage such as “alternative/advance fuels infrastructure” which is generally in common usage in the energy industry. Please refer to Section 17 of the EIR for a more complete discussion of such systems.

I9-89 (Plan SB GPU): Comment noted. General Plan goals are often broad in nature and are not required (or encouraged) by State planning and Zoning law to be overly detailed. Thank you for your detailed suggestions regarding this matter. The City does not concur that CEQA requires such detailed analysis of mitigation implementation (i.e., “small wind turban siting analysis”) at the General Plan level. However, the City will consider these interesting recommendations and any measures needed to ease micro production during the development of its CCCAP.

I9-90 (Plan SB GPU): Comment noted. General Plan goals are often broad in nature and are not required (or encouraged) by State planning and Zoning law to be overly detailed. Thank you for your detailed suggestions regarding this matter. The City will consider these recommendations during the development of its CCCAP.

I9-91 (Plan SB GPU): Comment noted. A General Plan is not required to define terms in common usage such as “new construction or significant remodel projects.” If the City adopts specific guidelines, terms will be defined as required by statute. More detailed implementation will also be set forth as part of the CCCAP identified in ER1.1. Thank you for your detailed suggestions regarding this matter. The City will consider these specific recommendations during the development of its CCCAP.

I9-92 (Plan SB GPU): Comment noted. General Plan is not required to define terms in common usage such as “non-toxic materials.” If and when the City adopts specific incentives and guidelines, terms will be defined as necessary.

I9-93 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. More detailed implementation will also be set forth as part of the CCCAP identified in ER1.1. Thank you for your detailed suggestions regarding this matter. The City will consider these specific recommendations during the development of its CCCAP.

I9-94 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further elaboration to be consistent with CEQA. The regional air quality impacts of development under *Plan Santa Barbara* have been identified as insignificant and therefore recommended measures such as this policy require no further elaboration.

I9-95 (Plan SB GPU): Comment noted. Nothing in State law prohibits the City from establishing such ordinance standards. The City will consider these specific recommendations during the development of any new ordinance.

I9-96 (Plan SB GPU): Comment noted. The policy is not internally inconsistent. Existing and proposed City policy encourages use of drought tolerant vegetation with a mix of both native and non-native plants acceptable in urban areas; landscaping within or adjacent to native habitats or areas designated for restoration would be required to consist of native species. Irrigation and landform stability would also be addressed under mitigation measure MM GEO 1a (Shoreline Management Plan) and GP Policy ER1 (Climate Change) and ER4 (Incorporation of Adaptation in Development).

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

I9-97 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define terms in common usage such as “to the extent reasonably possible.” State law permits leaving flexibility for future decision-makers on such matters and allow consideration of the fact for future cases when applying this policy.

I9-98 (Plan SB GPU): Comment noted. This policy is intended to apply to uplands habitats. Coastal bluff scrub is a recognized Environmentally Sensitive Habitat under the City Local Coastal Plan.

I9-99 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define each and every term used in the document. Further details of implementation of the Action will be addressed during development of updated multi-use plans.

I9-100 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. The policy is citywide in nature and is not intended to address any one parcel or subarea.

I9-101 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define all actions set forth within the policy, but to provide guidance for review of future actions allowing for reasonable discretion on the part of staff and decision-makers.

I9-102 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. The policy is citywide in nature and is not intended to address any one parcel or subarea. Coastal bluff scrub is a recognized Environmentally Sensitive Habitat under the City Local Coastal Plan. Please see also responses I8-8, I8-10 and I8-11.

I9-103 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define all actions set forth within the policy, but to provide guidance for review of future actions allowing for reasonable discretion on the part of staff and decision-makers.

I9-104 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. The policy is citywide in nature and is not intended to address any one parcel or subarea.

I9-105 (Plan SB GPU): Comment noted. See responses I9-18 through I9-56.

I9-106 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define all actions set forth within the policy, but to provide guidance for review of future actions allowing for reasonable discretion on the part of staff and decision-makers. The policy is citywide in nature and is not intended to address any one parcel or subarea.

I9-107 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define each and every term used in the document. Further details of implementation of the Action will be addressed during development of the future visual study. Thank you for your detailed suggestions regarding this matter. The City will consider these specific recommendations during the development of this future study.

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

I9-108 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define all actions and terms set forth within the policy, but to provide guidance for implementation of future actions allowing for reasonable discretion on the part of staff and decision-makers. The Action is not internally inconsistent, but is intentionally broad to permit the City to adopt a mix of standards and guidelines based on the outcome of future review, the sensitivity of resources affected, and public input received.

I9-109 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define all actions and terms set forth within the policy, but to provide guidance for implementation of future actions allowing for reasonable discretion on the part of staff and decision-makers.

I9-110 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define all terms set forth within the policy, but to provide guidance for future decisions while allowing for reasonable discretion on the part of staff and decision-makers. The policy is citywide in nature and is not intended to address any one subarea or hillside.

I9-111 (Plan SB GPU): Comment noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define all terms set forth within the policy, but to provide guidance for future decisions while allowing for reasonable discretion on the part of staff and decision-makers. Private views would be subject to protection to the extent consistent with City ordinance and State law.

I9-112 (Plan SB GPU): Comment noted. The policy is citywide in nature and is not intended to address any one subarea or sea cliff. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define all terms set forth within the policy, but to provide guidance for future decisions while allowing for reasonable discretion on the part of staff and decision makers.

I9-113 (Plan SB GPU): This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define all terms set forth within the policy, but to provide guidance for future decisions while allowing for reasonable discretion on the part of staff and decision-makers.

I9-114 (Plan SB GPU): Comment noted. See response I9-8.

I9-115 (Plan SB GPU): Comment noted. The policy is citywide in nature and is not intended to address any one parcel or subarea.

I9-116 (Plan SB GPU): Comment noted. The policy is citywide in nature and is not intended to address any one parcel or subarea.

I9-117 (Plan SB GPU): Comment noted. See response I9-8

I9-118 (Plan SB GPU): Comment noted. See response I9-8. This Housing Element goal is a broad goal to encourage housing for all economic levels. Again, the fact that these two parcels are not on the Suitable Sites Inventory would not in of itself preclude development of a single family residence that complies with all applicable codes and regulations.

I9-119 (Plan SB GPU): Comment noted. See response I9-8 and I9-118.

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

I9-120 (Plan SB GPU): Comment noted.

I9-121 (Plan SB GPU): Comment noted. The Public Services and Safety Element includes the existing Seismic Safety and Safety Element and the existing Noise Element. With the exception of recommended new policies, this element is not being updated in this phase of the plan but would be in the future.

I9-122 (Plan SB GPU): Comment noted. General Plan policies apply to City public facilities and operations as well as private development. Please also see the existing Sustainable Santa Barbara plan (www.SantaBarbaraCA.gov).

I9-123 (Plan SB GPU): Comments noted. This General Plan policy is appropriately detailed and requires no further definition or explanation. A General Plan is not required to define all actions and terms set forth within the policy, but to provide guidance for implementation of future actions allowing for reasonable discretion on the part of staff and decision-makers. Please see also responses I8-8, I8-10 and I8-11.

I9-124 (Plan SB GPU): Comment noted. Please see responses I8-8, I8-10 and I8-11

Draft EIR

I9-1 (EIR): Comment noted. The photo is simply an oblique view of Santa Barbara.

I9-2 (EIR): Comments noted. The EIR assesses the impacts of the *Plan Santa Barbara* GPU as set forth by the City. The City Council retains broad discretion on how to define the scope of this General Plan update. The EIR Project Description simply summarizes the project. The EIR addresses citywide impacts and is not intended to address any one subarea or sea cliff. The proposed maps are parcel-based. Please refer to City online GIS maps and/or request a meeting with City staff to review such parcel-specific information.

I9-3 (EIR): Comment noted. The maps, at 1-inch to 3,000-foot scale, depict the approximate shoreline and are intended for general citywide display purposes. They are not intended to depict specific parcels when reproduced at this scale. Please refer to City online GIS maps and/or request a meeting with City staff to review such parcel-specific information.

I9-4 (EIR): Comment noted. The statement refers to overall City growth. General Plans are often broad in nature and are not required by State planning and Zoning law to address specific site or parcel conditions at a high level of detail.

I9-5 (EIR): Comment noted. The summary refers to issues of citywide concern and is not parcel-specific.

I9-6 (EIR): Comment noted. “Sea cliff” and “bluff” are interchangeable terms.

I9-7 (EIR): Comment noted. The EIR identifies generation of GHGs within the City, describes their incremental contribution to climate change, and proposes mitigation measures to approach or achieve carbon neutrality. The EIR’s analysis remains conservative as required by CEQA, acknowledging the challenges with achieving these goals, and providing a project alternative more capable of reducing or eliminating this impact.

I9-8 (EIR): Comment noted. The EIR’s analysis of issues is programmatic in nature as is appropriate for a citywide Program EIR on a General Plan. Impacts to upland habitat are both quantified and generally characterized at a citywide programmatic level. Parcel specific analysis is not required.

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

I9-9 (EIR): Comment noted. The EIR's analysis of issues is programmatic in nature as is appropriate for a citywide Program EIR on a General Plan. Impacts to upland habitat are both quantified and generally characterized at a citywide programmatic level. The EIR assesses citywide impacts and is not intended to address any one parcel or subarea; parcel specific analysis is not required. Coastal bluff scrub is a recognized Environmentally Sensitive Habitat under the City Local Coastal Plan.

I9-10 (EIR): Comment noted. The EIR's analysis of issues is programmatic in nature as is appropriate for a citywide Program EIR on a General Plan. Impacts to geologic hazards are both quantified and generally characterized at a citywide programmatic level. The EIR assesses citywide impacts and is not intended to address any one parcel or subarea; parcel specific analysis is not required.

I9-11 (EIR): Comment noted. The EIR's analysis of issues is programmatic in nature as is appropriate for a citywide Program EIR on a General Plan. Impacts to open space are general; however, the City determines the requisite threshold criteria for "important open space areas" based on facts in the General Plan and other documents. The EIR assesses citywide impacts and is not intended to address any one parcel or subarea; parcel specific analysis is not required.

I9-12 (EIR): Comment noted. The EIR's analysis of issues is programmatic in nature as is appropriate for a citywide Program EIR on a General Plan. This mitigation measure is area- and citywide and programmatic in nature and is not intended to address any one parcel or subarea.

I9-13 (EIR): Comment noted. The EIR's analysis of issues is programmatic in nature as is appropriate for a citywide Program EIR on a General Plan. Impacts to upland habitat are both quantified and generally characterized at a citywide programmatic level. The EIR assesses citywide impacts and is not intended to address any one parcel or subarea; parcel specific analysis is not required. Coastal bluff scrub is a recognized Environmentally Sensitive Habitat under the City Local Coastal Plan.

I9-14 (EIR): Comment noted. The EIR's analysis of issues is programmatic in nature as is appropriate for a citywide Program EIR on a General Plan. This mitigation measure is area- and citywide and programmatic nature and is not intended to address any one parcel or subarea. Please refer to Section 13 for a detailed analysis of impacts to views.

I9-15 (EIR): Comment noted. The EIR's analysis of issues is programmatic in nature as is appropriate for a citywide Program EIR on a General Plan. This mitigation measure is area- and citywide and programmatic nature and is not intended to address any one parcel or subarea. Application to specific parcels would be considered on a case by case basis; however, no substantial evidence or credible analysis has been provided that this policy would somehow result in a "taking" of a particular site or parcel.

I9-16 (EIR): Comment noted. The EIR's analysis of issues is programmatic in nature as is appropriate for a citywide Program EIR on a General Plan. This mitigation measure is area and citywide and programmatic in nature and is not intended to address any one parcel or subarea.

I9-17 (EIR): Comment noted. The maps are prepared at a 1-inch to 3,000-foot scale, depict the approximate shoreline, and are intended for general citywide display purposes. They are not intended to depict specific parcels when reproduced at this scale. Please refer to City online GIS maps and/or request a meeting with City staff to review such parcel or subarea specific information.

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

I9-18 (EIR): Comment noted. The maps are designed as general document displays at a 1-inch to 3,000-foot scale, depict the approximate habitat areas, and are intended for general citywide display purposes. They are not intended to depict specific parcels when reproduced at this scale. Please refer to City online GIS maps and/or request a meeting with City staff to review such parcel or subarea specific information. Surveys of habitats on particular parcels are not required at a general plan programmatic analysis level.

I9-19 (EIR): Comment noted. The maps are intended for general area-wide display purposes are not intended to depict specific parcels when reproduced at this scale. Please refer to City online GIS maps and/or request a meeting with City staff to review such parcel or subarea specific information. Please also refer to responses I8-8, I8-10 and I8-11.

I9-20 (EIR): Comment noted. Please refer to responses I8-8, I8-10 and I8-11.

I9-21 (EIR): Comments noted. The analysis in the EIR is citywide in nature. This caption illustrates a general characterization that a number of residences could be subject to damage or destruction from sea cliff retreat. Please see amended EIR text regarding timing as part of Impact GEO-2.4. Please also refer to responses I8-8, I8-10 and I8-11. Please refer to City ordinances for a definition of “bluff edge” or top of bluff.

I9-22 (EIR): Comments noted. The analysis in the EIR is citywide in nature. Please also refer to responses I8-8, I8-10 and I8-11.

I9-23 (EIR): Comment noted. EIR mitigation measures are designed to mitigate project impacts; it is certainly within the authority of the City to modify or amend its plans, policies, ordinances, and programs to implement required or recommended mitigation measures.

I9-24 (EIR): Comment noted. The maps are prepared at a 1-inch to 3,000-foot scale, depict the approximate shoreline, and are intended for general citywide display purposes. They are not intended to depict specific parcels when reproduced at this scale. Please refer to City online GIS maps and/or request a meeting with City staff to review such parcel or subarea specific information.

I9-25 (EIR): Comment noted. The maps are intended for general area-wide display purposes are not intended to depict specific parcels when reproduced at this scale. Please refer to City online GIS maps and/or request a meeting with City staff to review such parcel or subarea specific information.

I9-26 (EIR): Comment noted. The EIR’s analysis of issues is programmatic in nature as is appropriate for a citywide Program EIR on a General Plan. This particular analysis is focused on steep Mesa hillsides overlooking the City; however, grading and clearing of substantial areas of coastal bluff vegetation visible from the beach or nearshore waters, while potentially not as likely due to more limited aerial extent, may contribute to this impact.

I9-27 (EIR): Comment noted. Please refer to response I9-14.

I9-28 (EIR): Comments noted. Please also refer to responses I8-8, I8-10 and I8-11.

I9-29 (EIR): Comment noted. The maps are intended for general area-wide display purposes are not intended to depict specific parcels when reproduced at this scale. As required by recent amendments to CEQA, the EIR also discloses the potential long-term implications of sea level rise and associated flooding. These maps are based on studies endorsed by the State of California, and constitute the most current available information on the possible implications of sea level rise upon coastal properties in the city of Santa Barbara.

I9, Norbert Dall, Dall and Associates/Matrix (Continued)

The EIR is careful to characterize this data as general in nature and as such, it is provided in the interest of full disclosure and to meet State requirements that such potential climate change hazards be disclosed. The impact analysis in Section 11 (Hydrology) is based on current flood hydrographs. It would be inappropriate for the City to not include such available information in the EIR. Please also refer to responses I8-8, I8-10 and I8-11.

I10, Blair S. Edwards (May 11, 2010)

Response to Individual Letter # I10, Blair S. Edwards (May 11, 2010)

I10-1 (Plan SB GPU): Thank you for your comments, which will be forwarded to decision-makers.

I11, Tracy Fernandez (May 17, 2010)

Response to Individual Letter # I11, Tracy Fernandez (May 17, 2010)

I11-1: Thank you for your comments. The City understands and appreciates residents' concerns regarding maintaining reasonably tranquil residential neighborhoods and protecting residents and other sensitive receptors from undue adverse noise levels. City policies and standard practice are to regulate development and permitted activities to protect single-family and other residential neighborhoods from unacceptable levels of noise. The City noise ordinance applies to special events, parties, etc. to limit undue intrusion on surrounding neighbors and will continue to do so after adoption of *Plan Santa Barbara*. Also, in order to further City policies for maintaining quiet, high quality neighborhoods, the EIR Recommended Measure RM NOISe-1 proposes addition of a policy to the General Plan to require more detailed noise assessments as part of project reviews for special, conditional, and institutional uses with activities or events that may affect residential neighborhoods.

Application of California Environmental Quality Act (CEQA) standards and determination of what constitutes a significant adverse environmental impact is a different issue. A significant impact involves potential health effects associated with long-term involuntary exposure to high noise levels. The EIR recognizes that the 65 decibel (dBA Ldn) standard for average exterior noise levels is used in the other surrounding jurisdictions and throughout the State. The EIR identifies the change in exterior noise standards under Policy ER37 as insignificant due to lack of significant adverse effects on human health. Under the exterior noise standard change, current construction techniques will allow interior noise reduction to the same standard requirements as before (45 DBA Ldn). As discussed in Section 12 of the EIR, it is now widely recognized that a standard of 60 dBA for exterior noise levels is unnecessary to prevent damage to health, sleep disturbance, and other issues recognized as significant noise impacts.

In urban and suburban areas, a certain amount of ambient background noise is part of the environmental setting. City policy strives to minimize adverse disturbance type of noise events; however, this does not necessarily mean that average noise levels in the 60-65 dBA range should be considered significant adverse impacts under CEQA. Section 15064 (b) of the State CEQA Guidelines clearly recognizes that the setting should be taken into account in determining impacts and that "For example, an activity which may not be significant in an urban area may be significant in a rural area." In this case, the City proposes to employ exterior noise standards widely recognized as acceptable in suburban and urban areas. Please see added text on human health issues related to Noise in Section 12.

City policy continues to support protection of residential areas from unduly adverse noise levels and City staff responds to specific noise complaints. The City's Noise Ordinance provides an adequate mechanism to address such concerns.

I12, Jan Hubbell (April 30, 2010)

Response to Individual Letter # I12, Jan Hubbell (April 30, 2010)

I12-1 (Plan SB GPU): Comments and policy recommendations are noted and will be forwarded to decision-makers for consideration. The proposed Plan sustainability principles pertain to environmental resources, including flora and fauna. Please see proposed General Plan Update biological resources policies in the Environmental Resources Element and EIR biological resources mitigation measures. The existing Conservation Element that includes protection of biological resources would remain operational until a comprehensive update of the new Environmental Resources Element (that would include relevant portions of the existing Conservation Element and the new GPU policies) occurs in a subsequent planning phase.

I12-2 (Plan SB GPU): Comment noted. Please see revised text in the General Plan Update and EIR.

I12-3 (Plan SB GPU): Comment noted. The Plan does envision identified principles and programs as tools for long-range planning. Please see Land Use Element Policy LG4, which identifies core commercial areas to direct most future growth, and LG17 (Sustainable Neighborhood Planning) which could provide for improved mobility within other neighborhoods such as the Mesa. Note that additional growth on the Mesa could result in further traffic effects at intersections near the freeway.

I12-4 (Plan SB GPU): As proposed, larger units are permitted but the overall average unit size may not exceed the average as noted on tables 1 and 2. Projects with 3 or more bedrooms could be permitted at higher densities at the largest unit size category. See the average density table in the Land Use Designation section of the General Plan.

I12-5 (Plan SB GPU): Comment noted. The proposed General Plan land use designation identified for Coast Village Road is General Urban, Commercial Medium High Density. The General Plan neighborhood description for Coast Village Road acknowledges that it is a predominantly commercial corridor with some older residential development.

I12-6 (Plan SB GPU): Comment noted.

I12-7 (Plan SB GPU): Comment noted.

I12-8 (Plan SB GPU): Comment noted.

I12-9 (Plan SB GPU): Policy LG10, Multigenerational Facilities and Uses, was added to address this specific issue. See edits to Measure LG17.1 for these uses to be considered also as part of Sustainable Neighborhood Plans for individual areas of the City, and see also Measures LG2 (Non-Residential Growth) and LG5 (Community Benefit Housing).

I12-10 (Plan SB GPU): Comment noted. The City is implementing a Historic Preservation Work Program that is in the process of surveying and identifying future Historic Districts throughout the City. Historic Resources within El Pueblo Viejo will be mapped and evaluated to determine where Historic Districts, permanent buffer areas, and overlay zones should be considered to provide further protection. An additional priority focus will be buffer protection for the historic adobe structures, the Brinkerhoff Avenue District, significant City Landmarks, and El Presidio State Historic Park located in the core of the City. See new policy HR5 added to the Historic Resources Element.

In response to concerns regarding how long it might take to adopt and implement buffer requirements or historic overlay zoning, additional strengthening of draft GP historic policies are proposed to go in effect with GPU adoption. Historic Preservation Policies listed under LG14.5 are proposed as interim buffer protection mechanisms pending future action on other listed implementation actions.

I12, Jan Hubbell (Continued)

I12-11 (Plan SB GPU): Comment noted. Development of a comprehensive Economic and Fiscal Health Element is not part of the current phase of work for the *Plan Santa Barbara* General Plan Update, and is slated for a subsequent planning phase. The proposed goals, policies and implementation actions provide initial policy direction. Please see added goal to address Tourism as an economic goal. Continuing policies that are part of the current General Plan or other City documents will be incorporated when the Element is comprehensively updated.

I12-12 (Plan SB GPU): Comment noted. The proposed General Plan Update sustainability principles and policies, as well as Housing Element goals, policies, and implementation actions, emphasize the importance of diverse and affordable housing.

I12-13 (Plan SB GPU): Comment noted. Please see edits to the Constraints chapter of the Housing Element under Air Quality.

I12-14 (Plan SB GPU): Comment noted. When the condominium conversion ordinance is developed, flexibility will need to be built into the findings to allow for conversion for purpose of providing income restricted affordable housing.

I12-15 (Plan SB GPU): Comment noted.

I12-16 (Plan SB GPU): Comment noted.

I12-17 (Plan SB GPU): Comment noted.

I12-18 (Plan SB GPU): Per conversations with the Building Official, after a disaster the City would request that buildings be shored up or otherwise stabilized and then evaluated. Existing CEQA Guidelines, City MEA Guidelines for Archaeological Resources and Historic Structures and Sites as well as ordinances currently exist with implementation that could be expedited if needed in case of an emergency. These ordinances include the demolition ordinances found in the Santa Barbara Municipal Code Chapter 22.22, Historic Structures (sections 22.22.035 and 22.22.037, 22.22.080).

I12-19 (Plan SB GPU): Comment noted.

I12-20 (Plan SB GPU): Comment noted. Please see response I12-1.

I12-21 (Plan SB GPU): Comment noted. Please see edits to GPU “Historic Context” and “Becoming Santa Barbara” sections.

I12-22 (Plan SB GPU): Comment noted.

I12-23 (Plan SB GPU): Comment noted. Please see expanded History of the City in Appendix B.

I12-24 (Plan SB GPU): Comment noted. Please see edits.

I12-25 (Plan SB GPU): Comment noted.

I12-26 (Plan SB GPU): Comment noted.

I12-27 (Plan SB GPU): Comment noted.

I12-28 (Plan SB GPU): Comment noted. Please see History of the City in Appendix B.

I12-29 (Plan SB GPU): Comment noted.

I12-30 (Plan SB GPU): Please see response I12-4.

I12, Jan Hubbell (Continued)

I12-31 (Plan SB GPU): Comment noted. Please see edits to text.

I12-32 (Plan SB GPU): Comment noted. Please see response to I12-5.

I12-33 (Plan SB GPU): Comments noted.

I12-34 (Plan SB GPU): The Milpas corridor and parcels that front on Milpas Street are proposed as Commercial High Density land use designations.

I12-35 (Plan SB GPU): Comment noted.

I12-36 (Plan SB GPU): Comment noted.

I12-37 (Plan SB GPU): Comment noted.

I12-38 (Plan SB GPU): What is intended by proposed policy LG2 reference to the Sphere is that if you annex land with existing development, the square footage does not count as net new square footage in the City. However, if you annex property and new square footage is proposed to be developed, then it counts as net new square footage and all development plan standards and compliance with the Adaptive Management Plan would apply. This is how annexations and Measure E square footage is currently treated.

I12-39 (Plan SB GPU): Comment noted. Under the proposed GPU policies, existing open space standards would apply until amendments to open space standards are considered for multi-family and commercial zones.

I12-40 (Plan SB GPU): Comment noted.

I12-41 (Plan SB GPU): Comment noted. As proposed, the priority for the C-M Zone would be job-producing, light industrial and service uses; however, residences would continue to be permitted as a secondary use.

I12-42 (Plan SB GPU): Comment noted. Please see response I12-9

I12-43 (Plan SB GPU): Comment noted.

I12-44 (Plan SB GPU): Comment noted.

I12-45 (Plan SB GPU): Migration corridors are included (note “connectivity with open space on adjacent parcels”). Please see also Environmental Resources Element/Biological Resources policies pertaining to migration corridors.

I12-46 (Plan SB GPU): Comment noted. Please see text edits.

I12-47 (Plan SB GPU): Comment noted. Implementation details to be worked out in the subsequent implementation phase.

I12-48 (Plan SB GPU): Please see response to I12-11.

I12-49 (Plan SB GPU): Comment noted. Please see text edits.

I12-50 (Plan SB GPU): Comment noted. Please see text edits.

I12-51 (Plan SB GPU): Comment noted. Recommended policies address protection of biological resources are included in the element.

I12-52 (Plan SB GPU): The proposed ER1.3 b policies include trees.

I12, Jan Hubbell (Continued)

I12-53 (Plan SB GPU): Comment noted. Please see edits.

I12-54 (Plan SB GPU): Comment noted. Please see text edits reflecting analysis from EIR.

I12-55 (Plan SB GPU): Comment noted. Please see text edits.

I12-56 (Plan SB GPU): Comment noted. Please see proposed Policy ER1.3

I12-57 (Plan SB GPU): Comment noted.

I12-58 (Plan SB GPU): Comment noted.

I12-59 (Plan SB GPU): Comment noted.

I12-60 (Plan SB GPU): Comment noted. Please see response to I12-12.

I12-61 (Plan SB GPU): Comment noted. Please see text edits.

I12-62 (Plan SB GPU): Comment noted. Please see edits to the Constraints chapter of the Housing Element under Air Quality.

I12-63 (Plan SB GPU): Comment noted.

I12-64 (Plan SB GPU): Comment noted. Please see text edits recognizing the sunset of the RDA in 2015. Also please see discussion in EIR Section 19 (Population and Jobs/Housing Balance).

I12-65 (Plan SB GPU): Comment noted.

I12-66 (Plan SB GPU): Comment noted. Please see response to I12-14.

I12-67 (Plan SB GPU): Comment noted.

I12-68 (Plan SB GPU): Comment noted. Please see text edits.

I12-69 (Plan SB GPU): Comments noted.

I12-70 (Plan SB GPU): Comments noted.

I12-71 (Plan SB GPU): Comment noted. No change is presently proposed to current policies and practices, which provide that primary structures would be outside of the identified setback, and accessory structures within the setback could be considered under discretionary permit approval, with consideration of potential impacts and resource protection policies.

I12-72 (Plan SB GPU): Please see response to I12-64.

I12-73 (Plan SB GPU): Comments are noted.

I12-74 (Plan SB GPU): Attachment 2 Pages 1-14 – Please see text edits.

I13, Peter Hunt (May 15, 2010)

Response to Individual Letter # I13, Peter Hunt (May 15, 2010)

I13-1 (Plan SB GPU): Thank you for your comments. Recommended policy in the *Plan Santa Barbara GPU* directs the next increment of growth to be located principally in the downtown and commercial districts to both reduce environmental impacts and work together to re-enforce these districts as economically viable, culturally significant, and healthy, livable places. Multiple plan objectives coincide in these locations including: more workforce housing; less effect on traffic congestion; proximity to frequent transit service; easy walking and biking access to commercial services (including fresh food), parks and open space.

The policy direction for encouraging affordable and workforce housing in the downtown would not preclude housing development in other areas of the City. The residential High Density land use designation (27-45 du/ac) is also being recommended for La Cumbre Plaza site and Milpas corridor. Currently areas of Upper State Street are zoned C-P which allows a base residential density of 12 dwelling units per acre. The Medium High Density (15-25 du/ac) is recommended along Upper State. While not the highest density that could be permitted, it is an increase from what is currently allowed. In addition, a 50% bonus density is being considered for community benefit housing (e.g., rental, employer sponsored, subsidized affordable) that could occur anywhere in the City that allows residential. The City Council will ultimately decide the densities and location of density designations as part of the adoption process of the General Plan Update.

I14, Wanda Livernois (May 17, 2010)

Response to Individual Letter # I14, Wanda Livernois (May 17, 2010)

I14-1 (Plan SB GPU): Thank you for your comments. City decision-makers and plans have supported and continue to encourage mixed-use in the downtown. Over the past 20 years, many of the development projects in downtown have been mixed-use. Because of concerns with large residential condominiums on the second and/or third and fourth floors, and concerns with size, bulk and scale, proposed General Plan update policies include limiting unit sizes as well as a number of Community Design Policies to keep building sizes compatible. Proposed Policy LG13 (Community Character, *previously numbered CH9 and CH14*) recommends strengthening and enhancing design and development review standards and creating development tools such as design overlays, form based codes, floor area ratios, and building setbacks (including guidelines and standards for commercial buildings downtown).

Currently, the City does not have good zoning standards for live-work land uses for home occupations in residential zones. Policy LG11 (Live-Work, *previously numbered LG13*) calls for providing viable live-work opportunities throughout the City. Future implementation of this policy would include creating zoning standards to address this.

While tourism is one of the main contributors of Santa Barbara's economy, the vision for the General Plan is that the downtown would be a place to work, live, and recreate for the residents of our community as well.

I15, Joan Livingston (May 15, 2010)

Response to Individual Letter # I15, Joan Livingston (May 15, 2010)

I15-1 (Plan SB GPU): Thank you for your comments, which have been forwarded to decision-makers. The *Plan Santa Barbara* process has included input from hundreds of citizens and dozens of agencies, organizations, and community groups, as well as direction from the City Council, Planning Commission, and other City advisory boards. Decision-makers as well as staff appreciate the broad community input received from individuals and groups that participated throughout the process, such as Citizens Planning Association, League of Women Voters, Santa Barbara For All, Allied Neighborhoods Association, and Community Environmental Council. Public comments received both in writing and at hearings have been forwarded to the Planning Commission and Council who will ultimately decide the direction of the plan and the vision for our City for the next 20 years.

I16, Catherine McCammon (May 17, 2010)

Response to Individual Letter # I16, Catherine McCammon (May 17, 2010)

I16-1: Thank you for your comments, which will be forwarded for decision-maker consideration.

With regard to document organization and alternatives, the alternatives were structured to permit comparison of impacts for policy differences and varied amounts of housing and nonresidential development. Please also see response O3-2.

With regard to terminology and affordable housing, the EIR reflects language and terminology from the proposed General Plan Update. Affordable housing is generally defined as that affordable to household earning 80-120% of the median income, while the City has also identified workforce housing, affordable to households earning up to 200% of the median income, as a priority. Please see EIR Section 19 (Population and Jobs/Housing Balance) and the draft Housing Element update for a further discussion of this issue.

In regard to Transportation Demand Management (TDM), please see EIR Section 16.3.3 (Transportation/*Plan Santa Barbara* Traffic Model/Travel Demand Management Strategies) and Volume II, Appendix I for a more complete discussion of TDM. The EIR does identify and evaluate a range of potential TDM measures. The reason that parking pricing is a particularly effective measure for managing traffic congestion is that it would apply not just to the small increment of additional future growth, but would also manage existing traffic.

With regard to assumptions, please see response O3-3. The EIR does not assume that all new units or new housing clustered Downtown would be affordable to new employees; please see EIR Section 19 (Population and Jobs/Housing Balance), particularly Tables 19.11 (Projected Affordable Housing Needs) and 19.12 (Population, Employment, and Housing Growth under Plan Santa Barbara and Alternatives). As described in Section 3 (Project Description), units are clustered Downtown to ease use of alternative transportation and allow for higher density and decreased per unit costs.

With regard to transit, the EIR does not assume that all residents of units on transit corridors will use transit; rather the EIR employs empirical trip generation rates for new development based on observations of the trip making characteristics of development located with certain subareas of the City. It is not assumed that all residents adjacent to transit will use transit, however it will be accessible to do so and a portion of people may choose to do so. It is not necessary for all such residents to use transit or other alternative modes in order to manage traffic levels.

Please see response O1-2. It is not assumed at all commuters would want to live in a downtown condominium, but a portion may want to, which could reduce commuter miles. However, due to difficulties in calculating such effects, the EIR analysis is conservative and does not assume that housing materially affects commuting levels.

With regard to impacts and assumptions, please see response O1-2. The EIR's assumptions are generally conservative and have received extensive review from both the EIR consultant and City staff. For example, it is not assumed that all new residents will ride transit or that all new housing will be affordable.

I16-2: Comments noted. Please see responses below.

Page 8: CEQA requires a brief EIR summary, including identification of items of known controversy. Please refer to particular EIR sections for more detailed analysis of controversial issues. Please see EIR Section 18.3.2 (Climate Change Policies/California Policies) which discusses AB 32.

I16, Catherine McCammon (Continued)

Page 9: Each section of the EIR impact analysis includes evaluation of comparative impacts of the Alternatives. Please also refer to the Executive Summary Table ES-2 Impact of Alternatives Compared to *Plan Santa Barbara*, EIR Section 22 (Summary of Alternatives Analysis) and Table 22.1 (Summary of Growth and Policy Assumptions) and Table 22.2 (Summary of Comparative Impacts) for comparison of the alternatives.

Page 2-7: EIR Section 2.5 (Background: City General Plan and Growth Management Tools) provides a general overview of the Variable Density Ordinance. Also, please refer to the draft Housing Element for more detailed explanation as well as the existing City ordinance (www.SantaBarbaraCA.gov). For the sake of brevity, the EIR cannot provide more extensive in-depth discussion of existing City policies and programs.

Page 2-9: EIR Section 2.5.6 (Transfer of Existing Development Rights) provides a general overview of the Transfer of Existing Development Ordinance; please refer to the City's website for a more detailed explanation of the existing TEDR.

Page 3-2: The MODA principles have always been intended to "mitigate impacts" by reducing trip generation and associated congestion, energy use, pollutant emissions, etc. Please see the draft Land Use Element Goals, Policies and Implementation Section for the current status of the policies.

Page 3-4: This discussion of jobs/housing balance as a part of the Project Description in Section 3.3.1 (*Plan Santa Barbara* Components/Updated Land Use and Housing Elements) refers to general overall goals. Please refer to EIR Section 19 (Population and Jobs/Housing Balance) for detailed information on job creation and housing demand, particularly Tables 19.9 (Employment Induced by Non-Residential Growth), 19.10 (Employment and Housing Growth), and 19.11 (Projected Affordable Housing Needs).

I16-3: Comments noted. Please see responses below. Please see Section 19 (Population and Jobs/Housing Balance) for a more detailed discussion of jobs/housing balance issues. However, the EIR analysis does not make assumptions that all future housing developed will be affordable. The proposed policy changes to provide for smaller units in targeted locations with some density incentives aim to result in improved potential for some market units affordable for workforce housing. With regard to secondary employment generation, please refer to response O3-3, O3-4 and C13-3.

Page 3-5: There is no historic, existing, or proposed future numerical cap on the number of housing units.

Page 3-18: No numerical caps currently exist for provision of housing and none are proposed as noted on page 3-18. The EIR analyzes and discusses the project as proposed by the City. The City has had a relatively stable rate of residential growth over past decades, and the EIR assumes a continuation of a similar slow rate into the future for the *Plan Santa Barbara* project. The EIR also looks at the comparative impacts if stronger policy incentives were adopted that resulted in more housing (Additional Housing Alternative). Please see Section 19 (Population and Jobs/Housing Balance) for a discussion of jobs/housing balance and issues with providing adequate amounts of affordable housing.

Updated Measure E provisions are part of the proposed project for non-residential growth, but have never been applied to residential growth. Rather than a cap of residential units or residential square footage, the *Plan Santa Barbara* General Plan Update proposes policies requiring that resources and services are adequate to support additional housing development, and an Adaptive Management Program that would track housing development and supporting resources and impacts.

I16, Catherine McCammon (Continued)

Page 3-5: EIR Section 3.3.1 summarizes the project description as proposed by the City. Please see Section 19 (Population and Jobs/Housing Balance) for a detailed analysis of employment and housing issues. An Adaptive Management Program is proposed to monitor resources and development over time. Alternatives are under consideration to compare the advantages and drawbacks of locating the additional density in the Downtown vs. existing residential areas.

Page 4-1/Table 4.1: Please see responses O1-2 and O3-7. EIR Table 4.1 lists the EIR assumptions supporting the project description for purposes of impact evaluation. For a detailed analysis of traffic issues please see Section 16. The EIR employs a very conservative assumption regarding housing and commuting. Although it is expected that additional housing could be beneficial to reduction of commuting, due to the difficulty in providing precise calculations, the analysis does not assume that new housing would materially affect the amount of commuting.

Table 4.3: Please refer to the City's draft General Plan Land Use Element. In general, projects providing substantial community benefits could be granted greater latitude regarding height and density, while market projects could be more restricted.

I16-4 (Section 5, Alternatives): The MODA principles remain a key component of the Plan. The policies propose in-fill development along transit corridors in close proximity (i.e., walking distance) to a range of uses. Removal of a formalized particular MODA boundary from the proposed Land Use Map does not substantially alter the analysis as a similar policy set remains. For example, as shown on Map 2 of the January 2009 Draft Policy Preferences Report, the MODA boundaries encompassed most of the medium and higher density areas within the City as well as straddling the major transit corridors. The revised policies continue to direct growth to subareas in these same regions.

I16-5 (Section 6, Air Quality): The EIR provides a discussion of potential air quality impacts and concludes, based on both City-specific and statewide studies, that only the U.S. Highway 101 corridor generates sufficiently high levels of pollutants to be of potential concern regarding significant health and respiratory issues. Please see also responses A9-2 and O-3-8. With regard to the Additional Housing Alternative and increased congestion, this Alternative is forecast to have the least congestion of any of the alternatives studied.

I16-6 (Section 10, Historic Resources): Please refer to Figure 10.1 which depicts City Design/Historic Districts and a selection of major sites. Please see Figure 3.1 which shows the City's existing commercial designations and Figure 3.2 which depicts the proposed Commercial/High Density. Both the existing Commercial designations and the proposed Commercial/High Density designations occupy substantial portions of the El Pueblo Viejo Landmark District and abut the Brinkerhoff Avenue Landmark District. Please refer to the City Master Environmental Assessment historic resources map which identifies historic resources in the City and is available online at www.YouPlanSB.org/Document/Topics/EnvironmentalResourceMaps.

With regard to mitigation, the Plan proposes adding additional policies and design tools and criteria to ensure compatibility of building size and design and protection of historic resources, including form-based codes, floor-to-area ratios, and historic resource buffers. There will also be a separate Historic Resources Element prepared. The EIR analysis finds that the combination of building restrictions, new development codes, and strengthened review process together with existing protections would address potential impacts to Heritage Resources.

I16, Catherine McCammon (Continued)**I16-7 (Section 16, Transportation):** Comments noted.

In general, analysis of a project's economic consequences is outside the scope of an EIR per CEQA. However, it is worth noting that Central Coast cities, such as San Luis Obispo, charge for on-street, surface, and garage parking as do other noted successful downtowns such as Santa Monica and Pasadena. Free parking is likely one factor that shoppers and other patrons of Downtown businesses consider when choosing a retail, entertainment, or cultural destination.

In regard to transit use, the EIR acknowledges the City's goal to increase transit use and the likely success of this goal under a "robust" TDM program. However, due to the difficulty and expense of obtaining detailed information, the Traffic Model does not quantify trip reduction measures associated with increased transit usage, and the model outputs represent a conservative more worst-case impact scenario. Please see EIR Section 16.3.3 (*Plan Santa Barbara* Traffic Model) and Appendix I for more information.

With regard to number of commuters and composition of the alternatives, please see response O3-2.

The EIR does not assume that TDM is traffic neutral, but that it results in substantial trip reductions for both existing and new uses. Please refer to EIR Sections 16.3.3 and 16.8.

The amount of minutes allocated to free parking are under the control of City decision-makers.

With regard to adding a new mitigation measure to reduce development in outlying areas, *Plan Santa Barbara* provides an array of incentives to develop within the City's core and disincentives for development in outlying areas. However, please see suggested policy revisions suggesting that the City consider adoption of traffic impact fees for non-beneficial outlying development projects.

With regard to shuttles, the draft General Plan and EIR program additional transit planning to address how best to improve transit service.

Please refer to Section 23, Mitigation Monitoring and Reporting for a discussion of mitigation timing.

Regarding the potential for parking overspill as a result of TDM parking pricing, the majority of Downtown neighborhoods now have parking programs in place, and literature indicates that a majority of commuters will not walk more than ¼ mile from parking to employment locations. Further, the TDM assumptions are based on studies of multiple jurisdictions and are conservative as to effectiveness. Information as to specific effects of TDM on the subset of nonprofits and volunteers is not available and would generally be considered as socioeconomic issues and not environmental impacts.

I16-8 (Section 19): Section 19 (Population and Jobs/Housing Balance) does not assume that increased density will help the jobs/housing balance, but rather provides an assessment of the numbers of jobs compared to housing while identifying a significant shortfall of affordable housing. The Additional Housing Alternative is identified as improving the jobs/housing balance based on the very straightforward conclusion that it would provide a limited job growth and high housing growth.

The Lower Growth Alternative is identified as having low employment growth but very low housing, and includes lower densities which are forecast to limit affordable housing production.

With regard to employee housing, UCSB has provided 65 faculty units for a workforce of over 4,000 employees. The EIR also notes that UCSB is moving forward with plans to construct substantial amounts of new student and employee housing.

I17, Richard A Oliver (March 23, 2010)

Response to Individual Letter # I17, Richard A Oliver (March 23, 2010)

I17-1: Thank you for your comments. The City appreciates your feedback and input. Your property on De La Vina Street is currently zoned R-3, Multiple Family Residential with an existing General Plan Land Use land use designation of Residential -12 Dwelling Units Per Acre. This area does currently permit the use of variable density that would allow a range in residential density of 15-27 dwelling units per acre. The Draft General Plan Update recommendation for this area was for High Density. However, a Medium High Density of 15-25 dwelling units per acre for the multi-family areas downtown is being considered. This would be similar to the existing densities currently allowed. However, these density designations are still under discussion and will ultimately be decided by City Council at the adoption of the General Plan Update.

I18, Judy Orias (April 26, 2010)

Response to Individual Letter # I18, Judy Orias (April 26, 2010)

I18-1: Thank you for your comments, which will be forwarded for decision-maker consideration.

Regarding the EIR:

Terminology, terms, agencies, plans, etc. are generally identified or defined once in each major section and then abbreviated thereafter for the sake of brevity. A list of acronyms is provided in Section 26. The difficulty of reviewing multiple acronyms and flipping back to the master list is appreciated; however the use of extensive footnotes and repeated references would unduly break-up text and add to document length.

Regarding the impacts of growth plans, please see EIR Section 22 (Summary of Alternatives Analysis) and Table 22.1 for comparison of the impacts of alternatives.

Regarding assumptions, the EIR does not presume lifestyle changes, and assumptions were carefully reviewed and are clearly spelled out in EIR Section 4. Please see responses I16-1, O1-2 and O3-7.

Please see EIR Section 16 (Transportation) regarding commuting, in particular Section 16.1 (Setting) and Table 16.1.1. Please note that the EIR uses trip generation and distribution assumptions based on empirical data gathered from existing uses, such as housing, to determine impacts. Although provision of substantial amounts of housing may have beneficial impacts on commuting, the EIR does not assume that housing will end or greatly reduce commuting. Please see responses I16-7, O1-3.

The EIR does not assume the City can build enough housing to meet demand. Please refer the Section 19 (Population and Jobs/Housing Balance) for a complete discussion of housing issues.

Please refer to Sections 14 (Public Services) and 15 (Public Utilities) for analysis of the potential impacts of each alternative on Public Services and Utilities, including a general discussion of costs where applicable. However, the EIR is not required to and does not provide detailed economic analysis of all cost-related matters, but considers on basic feasibility.

Regarding the General Plan:

I18-2 (Plan SB GPU):

Re: GPU Neighborhood Descriptions: Comments noted. Additional neighborhood-specific profile information could be added during the implementation of Sustainable Neighborhood Planning phases.

Re: Wildland Fire Plan: Comments noted. The City of Santa Barbara General Plan- Seismic Safety – Safety Element adopted by the City Council in 1979 related to fire hazards, is augmented with the City's Wildland Fire Plan. The Fire Chief is mandated and has the authority to identify and amend areas within the City jurisdiction that are vulnerable to wildfire and to apply appropriate codes and strategies within these areas to protect life, property, and natural resources. This City's Fire Master Plan identifies high fire hazard areas and identifies policies and actions focused on reducing the impact of wildfire in our community. The operational High Fire Hazard Area Map is utilized as part of project review, and could be included in the General Plan at the time that the Public Services and Safety Element is updated. The existing Seismic Safety-Safety Element as well as the latest High Fire Hazard Area Map is used for project development and any necessary permit findings.

Re: Flood Map. Comments noted. The City Building Department as the floodplain coordinator in cooperation with the Federal Emergency Management Agency designates the flood zones within the City. The city

I18, Judy Orias (Continued)

wide flood map is included in the General Plan to comply with Land Use Element requirements to show properties subject to flooding. However, keep in mind that these areas are subject to change over time. Area flood zone studies are conducted periodically and designated floodplain boundaries are updated as needed by the City in coordination with required FEMA procedures. As part of project review, the latest flood zone maps would be consulted.

Re: Second Units: Comments noted. The relaxation of second unit standards, such as unit size limitations, lot size limitations, affordability requirements, and tandem parking restrictions, is under consideration as a measure to provide more diverse workforce housing. The location of these units would continue to be prohibited in high fire districts, and other issues would need to be further examined such as: preferred locations adjacent to transit and commercial services; parking adequacy in single family neighborhoods; and Floor Area Ratios limits consistent with the Neighborhood Preservation Ordinance. The Council will consider the policy direction for secondary dwelling units prior to adopting the General Plan Update. If Council adopts the policy supporting relaxation of the standards in certain single family areas of the City, the details as discussed above would need to be worked out later as part of implementation of Policy H15 (Secondary Dwelling Units) and Implementation Measure H15.1 (Second Units, *previously numbered H14*), H15.2 (Secondary Dwelling Unit Ordinance), and H15.3 (Loan Program). The zoning amendments would require a public process in which interested residents could participate.

Re: Maps: Comments noted.

Re: Circulation Element: Comments noted. The proposed Plan includes land use and circulation policies to address traffic management and air quality. The EIR provides analysis of Plan policies for traffic impacts.

Re: Historical Background Information: Please see corrections and edits in the revised Draft General Plan Update document.

Re: Portions of Elements to be written at a later time. Your comments are noted. The primary scope of this phase of the General Plan Update is the Land Use Element and the Housing Element, along with limited updated policy direction and amendments for other elements. The other existing elements and any relevant policies would continue to be operational until they receive subsequent updates in later planning phases. With respect to historical resources, the City has extensive existing policies and procedures, as well as proposed new policies in the GPU to add more protection for historic resources. The EIR analysis includes evaluation of impacts of Plan policies on historic resources.

I19, Judy Orias (May 11, 2010)

Response to Individual Letter # I19, Judy Orias (May 11, 2010)

I19-1: Thank you for your comments, which will be forwarded to decision-makers. Please see responses to letter I18.

Regarding the commute, please refer to response letter I18 and Section 16 of the EIR for a complete discussion of local and regional traffic issues, including commuting.

I19-2: Comments noted. Please see responses to letter I18.

Regarding Neighborhood Descriptions, additional neighborhood-specific profile information could be added during the implementation of Sustainable Neighborhood Planning phases.

Schools and parks are shown on the City of Santa Barbara General Plan Land Use Map.

With regard to Fire hazards, please see Figures 9.2 (Wildland Fire Hazard) and 9.3 (Wildland Fire History) in the EIR.

With regard to flood maps, hard copy maps are printed at 1-inch to 3,000-foot scale and are for general information purposes. Please refer to online or electronic versions of the EIR.

Regarding locations for secondary units, Policy H15-Secondary Dwelling Units (*previously H14*) would permit secondary units throughout the City, but encouraged within close proximity to transit corridors. Areas where second units would be prohibited include high fire hazard areas as identified in Figure 9.2 of the EIR and Map 4 of the Policies Preferences Report (January 2009).

With respect to water supply, the EIR analysis found adequate resources to accommodate future growth under the Plan or alternatives studied.

The EIR reviewed the adequacy of sewer line capacity, including lines Downtown which are capable of serving higher density development.

The EIR considers the adequacy of public services and utilities in Sections 14 (Services) and 15 (Utilities). Where it appears warranted for feasibility consideration under CEQA (e.g., water supply), the EIR provides analysis of costs. Regarding errors and omissions in the Heritage Resources section please see responses A3-2 and response letter 025. The City and consultant have made every effort to correct such errors. However, it is worth noting that many of these errors concerned generally modest variation in dates of events (e.g., year 1782 vs. 1786) or timing of building construction, etc. that occurred 75 to 200 or more years in the past. While such details are important and will be addressed, these types of errors do not undermine the adequacy of the EIR.

With regard to General Plan elements, the Plan proposes preparation of a Historic Resources Element; please see responses A2-1 and response letter O25. The Circulation Element was comprehensively updated in 1994 and the draft General Plan update provides targeted policy updates to the Element and the EIR provides a comprehensive analysis of transportation and circulation issues..

With regard to Downtown, please see response I16-6.

The City looks forward to working with concerned individuals and organizations to balance new growth and development with available resources and protection of our cherished quality of life.

I20, Joe Rution (April 20, 2010)

Response to Individual Letter # I20, Joe Rution (April 20, 2010)

I20-1: Thank you for your comments. The City appreciates your feedback and input. Please see revised text in EIR Section 21. The sentence *“In addition, such restrictions would not be legal as they would constitute a ‘taking’ of vested private property development rights”* has been deleted.

I21, Joe Rution (April 28, 2010)

Response to Individual Letter # I21, Joe Rution (April 28, 2010)

I21-1: Thank you for your comments. The City appreciates your feedback and input. Your critique of the Plan has been forwarded to decision-makers. Please refer to Section 10.3.1 (Heritage Resources) and Section 10.6.3, as well as Section 13.3.1 (Open Space and Visual Resources) and Section 13.6.3 of the EIR for projected numbers of larger buildings under both *Plan Santa Barbara* and the Additional Housing Alternative.

I21-2 (Plan SB GPU): Comments noted. A major goal of *Plan Santa Barbara* is to ensure that new growth is comprised to the extent feasible of “community benefit uses.”

I21-3 (Plan SB GPU): Comment noted. The City’s decision-making process and identification of a potential “hybrid alternative” is focused on identifying the least harmful and most beneficial alternative.

I21-4: Comments noted. The assumptions supporting the EIR analysis were rigorously reviewed and conservative approaches were taken. For example, the EIR does not assume that City programs to provide work-force or affordable housing will be successful. Rather the EIR identifies new housing demand associated with job growth, identifies housing needs associated with this growth, and concludes that a very substantial shortfall of affordable housing will occur under *Plan Santa Barbara*. Please refer to EIR Section 19 (Population and Jobs/Housing Balance). Please also see responses O1-2 and O3-7.

I21-5 (Plan SB GPU): Comments noted. This generally reflects the approach utilized by the City’s decision-makers during the General Plan update adoption process.

I21-6 (Plan SB GPU): Comments noted. The type of housing units and areas targeted for additional density will be determined by City Council as part of their adoption process for the General Plan Update.

I21-7 (Plan SB GPU): Comments noted.

I21-8 (Plan SB GPU): Comments noted. The City Council will make final decisions on densities and bonus density provisions as part of the adoption process for the General Plan Update.

I21-9 through I21-15 (Plan SB GPU): Comments noted.

I22, Joe Rution (May 17, 2010)

Response to Individual Letter # I22, Joe Rution (May 17, 2010)

I22-1 (Plan SB GPU): Thank you for your comments. The City appreciates your feedback and input. Some of the frequently requested modifications include bonus density modifications for Affordable housing and workforce housing projects. As the implementation program for the average density program as well as implementation for Community Design Policies (LG13) and Parking Policies (C7) are considered, regulatory standards such as lot area, setbacks, open space, and parking requirements will be considered. This should result in reduction of some of the commonly requested modifications.

I23, Joe Rution (May 17, 2010)

Response to Individual Letter # I23, Joe Rution (May 17, 2010)

I23-1 (Plan SB GPU): Thank you for your comments. Maintaining the character of the older, near downtown residential neighborhoods is also important for the community. Please see edits to Desired Neighborhood Qualities in the Santa Barbara's Neighborhoods section to add, "older, established neighborhoods."

I23-2 (Plan SB GPU): Comments noted.

I23-3: Comments noted. The EIR provides programmatic level analysis of potential impacts to neighborhoods in two sections. Please refer to Section 10 (Heritage Resources) for an analysis of potential impacts to historic districts and structures and to Section 13 (Open Space and Visual Resources) for a description of the visual characteristics of City neighborhoods and possible impacts to these neighborhoods (refer to Impact VIS 3.6)

Policy LG 13 (Community Character) calls for design overlays for selected non-residential and residential areas of the city (including Downtown) through Form Base Codes, Floor Area Ratios, building setbacks, landscaping, open space requirements and design guidelines. As these implementation actions are developed, the historic character of the neighborhoods will be an important consideration.

I23-4 (Plan SB GPU): Comments noted.

I23-5 (Plan SB GPU): Comments noted. The General Plan Update policies proposed in this planning phase would provide updated policy direction for Historic Resources protection, for immediate use upon adoption, and also to provide direction for the development of a comprehensive new Historic Resources Element in a subsequent planning phase. See proposed additions to LG14 regarding buffers around historic structures and HR5 regarding historic resource protection including identifying historical districts. In addition, existing historic protection policies of the City within the Charter, General Plan Conservation Element, Ordinances, and Guidelines and the project permitting, design review, and environmental review processes will continue.

I24, Joe Rution (May 17, 2010)

Response to Individual Letter # I24, Joe Rution (May 17, 2010)

I24-1 (Plan SB GPU): Thank you for your comments. The City appreciates your feedback and input.

I24-2: Comments noted. Please refer to Section 23 Mitigation Monitoring and Reporting Program and Table 23.1 which sets forth the general timing, agency responsible, and source of funding for mitigation implementation. As required by CEQA, the EIR provides of a general analysis of the feasibility of mitigation implementation and the City's ability to implement required measures.

The concept of an Adaptive Management Program (AMP) as a feedback mechanism for the General Plan policies evolved through the *Plan Santa Barbara* process, and specifically from Planning Commission input. The Adaptive Management Program would evaluate the results of policy implementation to track progress toward the General Plan goals. The AMP would provide: periodic snapshots of what the city looks like under the policies of the updated General Plan; the identification of trends to evaluate the relevancy of objectives or the effectiveness of policies; and recommendations for amendments, when needed.

The AMP will provide the ability to make mid-course corrections toward the agreed-upon goals of the Plan and maintain its currency. Clearly, a key use of the AMP will be to monitor growth to determine the effectiveness of growth management policies in the plan. Monitoring would allow timely identification of growth trends, and thus amendment of policies in order to meet growth management goals.

Implementation action LG3.1 (*previously numbered AM1 – AM4*) calls for developing a comprehensive AMP to monitor, assess, adapt and inform the public and decision makers about implication to resources from the next increment of growth. The details of the program are still to be worked out. One option is to focus on the most critical planning goals and AMP objectives to include in a pilot program for City Council's consideration. Once the benefit of monitoring these objectives has been demonstrated, the program could be expanded to include additional objectives.

I25, Joe Rution (May 17, 2010)

Response to Individual Letter # I25, Joe Rution (May 17, 2010)

I25-1: Thank you for your comments. The EIR assesses the impacts associated with the proposed project and identifies a reasonable range of alternatives that could potentially reduce one or more significant impacts, based upon City identified project objectives. The range of alternative growth and policy sets selected also reflects the range of growth and policy option under community discussion, based on the extensive community opinion received. The EIR itself does not presume growth itself to be either beneficial or adverse, but rather assesses the impacts of such growth. In terms of the legal issues surrounding an absolute no growth alternative, State law generally provides broad discretion to jurisdictions regarding the type, location, and rate of growth. However, such discretion is tempered by factors such as the need to provide some use of existing legal parcels, requirements to strive to meet State mandated housing goals, etc. Please see revised text in EIR Section 21.4 (Alternatives Considered But Discarded) which elaborates upon these issues.

I26, Deborah Slaght (May 4, 2010)

Response to Individual Letter # I26, Deborah Slaght (May 4, 2010)

I26-1: Thank you for your comments. The City appreciates your feedback and input. Policy LG14 (Historic Structures, *previously numbered CH10*) calls for protecting historic structures through building height limits and other development standards in the Downtown. It has been proposed to add an implementation action to LG14 to establish buffers around historic resources to ensure that uses and structures nearby will be compatible.

I27, S Sphar (May 17, 2010)

Response to Individual Letter # I27, S Sphar (May 17, 2010)

I27-1 (Plan SB GPU): Thank you for your comments. The City appreciates your feedback and input. The General Plan does not address the specific details of individual parcels. It is not anticipated that the proposed policies cited would deny expansion of an existing small home adjacent to a creek, especially where the home is on one acre. EIR mitigation measure for creek and riparian habitat and species protection MM Bio-2.c (Creek Setback Development Policies), which is proposed to be added to the General Plan as Implementation Action ER16.1, would establish a general creek setback standard of 25 feet or greater, consistent with existing City ordinance provisions for Mission Creek. Proposed General Plan Policy ER18 (*previously numbered ER 27*) also calls for a follow-up process for considering and establishing more detailed updated creek setback and restoration standards for new development and redevelopment along creeks. Until updated creek setbacks are developed, projects would be continue to be considered on a case-by-case basis as is current planning policy, using the general new guideline. Limiting new development, avoidance of the site's most sensitive resources, and implementation of habitat restoration or other mitigation measures could be required to offset potential impacts.

I28, P Westbury (April 27, 2010)

Response to Individual Letter # I28, P Westbury (April 27, 2010)

I28-1 (Plan SB GPU): Thank you for your comments. The City appreciates your feedback and input. Proposed demolition of an older un-surveyed structure, feature, or site is currently regulated under Santa Barbara Municipal Code 22.22.035. The ordinance outlines the assessment and planning process that needs to occur to establish if the resource has potential historic resource significance and if a Historic Structure/Site Report is necessary to determine whether the structure should be considered for designation as a City Historic Resource. Demolition of any listed Historic Structure or Structure of Merit requires very specific criteria and approval by the Historic Landmarks Commission would have to occur.

New policies for protection of historic resources have been added to the General Plan. Please see new buffer protection mechanisms added to policy LG14 (Historic Structures, *previously numbered CH10*) and new policy HR5.

Policies encouraging the adaptive reuse of buildings, including historic buildings, are included in the General Plan Update. These include LG14.3 (Historic Structures/Adaptive Reuse), HR1 (Adaptive Reuse, *previously numbered CH1*), and EF11 (Re-Use of Commercial Space).

I29, P Westbury (May 5, 2010)

Response to Individual Letter # I29, P Westbury (May 5, 2010)

I29-1 (Plan SB GPU): Thank you for your comments. The City appreciates your feedback and input. General Plan Community Design Policy LG13 (Community Character) calls for strengthening and enhancing design and development review standards and process to protect and enhance community character. It is expected that design standards, including development of Form-Based Codes and/or Floor Area Ratios for Downtown would be developed in the future. In addition see response to I28 regarding policies addressing the protection of historic resources and adaptive reuse of existing buildings.

I30, M Whitehurst (May 3, 2010)

Response to Individual Letter # I30, M Whitehurst (May 3, 2010)

I30-1: Thank you for your comments. The City appreciates your feedback and input. Please see response C1-6 regarding economic issues and parking. The EIR analysis and mitigations are based on technical analysis as to effectiveness (please see EIR section 16.3.3 *Plan Santa Barbara* Traffic Model, and Volume II Appendix I6 Trip Reduction Impacts Analysis). Public on-street priced parking, if determined to be a desired implementation, could be phased in gradually over time. Additional data gathering would likely be necessary to determine appropriate parking rates and locations.

I31, Paul Zink (April 28, 2010)

Response to Individual Letter # I31, Paul Zink (April 28, 2010)

I31-1 (Plan SB GPU): Thank you for your comments. The City appreciates your feedback and input. The relaxation of second unit standards, such as unit size limitations, lot size limitations, affordability requirements, and tandem parking restrictions, is under consideration as a measure to provide more diverse work force housing. The location of these units would continue to be prohibited in high fire districts, and other issues would need to be further examined such as: preferred locations adjacent to transit and commercial services; parking adequacy in single family neighborhoods; and Floor Area Ratios limits consistent with the Neighborhood Preservation Ordinance. The Council will consider the policy direction for secondary dwelling units prior to adopting the General Plan Update. If Council adopts the policy supporting relaxation of the standards in certain single family areas of the City, the details as discussed above would need to be worked out later as part of implementation of Policy H15 (Secondary Dwelling Units) and Implementation Measure H15.1 (Second Units, *previously numbered H14*), H15.2 (Secondary Dwelling Unit Ordinance), and H15.3 (Loan Program). The zoning amendments would require a public process in which interested residents could participate.

Elings Park

IEP1, E & D Andersen (April 22, 2010)

Response to Individual Elings Park Letter # IEP1, E & D Andersen (April 22, 2010)

IEP1-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

Elings Park, both the north and south side, has a current designation of Community Park, although the park functions in some ways as a regional park. The proposed General Plan Update text, Draft General Plan Parks and Open Space Map, and EIR Section 14.1.3 (Public Services Setting/Parks and Recreation), have been corrected to show that Elings Park is designated as a Community Park. Changing the land use designation to Regional Park would have to be initiated by the City Council. City decision-makers may consider the appropriate land use designation for Elings Park as part of the General Plan Update adoption process. Your comments will be considered by City decision-makers, along with the relationship of any previous County actions or restrictions to the City's decision.

IEP2, E Becker (April 26, 2010)

Response to Individual Elings Park Letter # IEP2, E Becker (April 26, 2010)

IEP2-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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IEP3, S&S Comstock (May 23, 2010)

Response to Individual Elings Park Letter # IEP3, S&S Comstock (May 23, 2010)

IEP3-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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IEP4, B Giffin (April 27, 2010)

Response to Individual Elings Park Letter # IEP4, B Giffin (April 27, 2010)

IEP4-1: Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility.

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IEP5, M Howard (April 26, 2010)

Response to Individual Elings Park Letter # IEP5, M Howard (April 26, 2010)

IEP5-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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IEP6, J Johnson (April 28, 2010)

Response to Individual Elings Park Letter # IEP6, J Johnson (April 28, 2010)

IEP6-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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IEP7, T Kracke (April 26, 2010)

Response to Individual Elings Park Letter # IEP7, T Kracke (April 26, 2010)

IEP7-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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IEP8, P Kuhn (April 27, 2010)

Response to Individual Elings Park Letter # IEP8, P Kuhn (April 27, 2010)

IEP8-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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IEP9, J Lincoln (April 28, 2010)

Response to Individual Elings Park Letter # IEP9, J Lincoln (April 28, 2010)

IEP9-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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IEP10, L Melchiori (April 22, 2010)

Response to Individual Elings Park Letter # IEP10, L Melchiori (April 22, 2010)

IEP10-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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IEP11, H Michaels (April 26, 2010)

Response to Individual Elings Park Letter # IEP11, H Michaels (April 26, 2010)

IEP11-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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IEP12, T Rogers (April 26, 2010)

Response to Individual Elings Park Letter # IEP12, T Rogers (April 26, 2010)

IEP12-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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IEP13, C Vehrs (April 25, 2010)

Response to Individual Elings Park Letter # IEP13, C Vehrs (April 25, 2010)

IEP13-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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IEP14, L Williams (April 26, 2010)

Response to Individual Elings Park Letter # IEP14, L Williams (April 26, 2010)

IEP14-1 (Plan SB GPU): Thank you for your comments. The City looks forward to working cooperatively with Elings Park and surrounding neighbors to balance appropriate levels of park development and use with natural resource protection and neighborhood compatibility. The City strives to work with the managers of parks and other institutional uses adjacent to or within residential neighborhoods to minimize conflicts associated with noise, light and glare and other issues. To that end, the EIR identifies general impacts associated with amplified music (refer to Impact Noise-3.1), light and glare (Impact VIS-4), and the loss or fragmentation of important habitats in the Las Positas Valley (Impacts BIO 1.1 and 1.3).

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PLANNING COMMISSION PUBLIC HEARING

PC (April 28, May 6, June 3, 2010)

Response to PC Public Comments # PC (April 28, May 6, June 3, 2010)

PC-1 (Plan SB GPU): Thank you for your comments. Please refer to responses A2-1 and A2-6.

PC-2 (Plan SB GPU and EIR): Thank you for your comments. Please refer to response A13-4.

PC-3 (Plan SB GPU and EIR): Thank you for your comments. Please refer to responses O1-2, O1-3, O1-4, and I16-1.

PC-4 (Plan SB GPU): Thank you for your comments. Please refer to responses O2-2, O2-3, O2-4, O3-3, O3-4, and O3-8.

PC-5 (Plan SB GPU): Thank you for your comments. Please refer to response O5-1.

PC-6 (Plan SB GPU): Thank you for your comments. Please refer to responses O7-1, O7-2, and O7-3.

PC-7 (Plan SB GPU and EIR): Thank you for your comments. Please refer to responses O9-1 through O9-6.

PC-8 (Plan SB GPU and EIR): Thank you for your comments. Please refer to responses O11-1, O12-1, O13-2, and O13-3.

PC-9 (Plan SB GPU and EIR): Thank you for your comments. The EIR air quality analysis does account for technological change; however, CEQA requires a reasonable worst-case analysis of impacts. It is unreasonable to assume there will be a large shift away from fossil fuel-powered vehicles over the life of *Plan Santa Barbara*. With regard to vacation housing, please refer to responses CPA O2-2 and O3-3; housing impacts account for housing created and new jobs created. The EIR water supply forecast has been prepared by technical experts; please see Section 15, *Public Utilities*, for revisions to water supply analyses. With regard to building height impacts associated with potential earthquakes, please refer to Section 8, *Geological Conditions*; impacts are addressed by the Uniform Building Code. Please refer to response O18-1 regarding a Historic Element.

PC-10 (Plan SB GPU and EIR): Thank you for your comments. Please refer to responses O23-1 through O23-6.

PC-11 (Plan SB GPU): Thank you for your comments. Please refer to responses O22-1, O22-2, and O22-5.

PC-12 (Plan SB GPU): Thank you for your comments. Please refer to responses A2-1 and A2-6.

PC-13 (Plan SB GPU): Thank you for your comments. Please refer to responses O26-1 and O26-6.

PC-14 (Plan SB GPU): Thank you for your comments.

PC-15 (Plan SB GPU and EIR): Thank you for your comments. Comments are noted. Please refer to Section 16, *Transportation*, for discussion of regional impacts to transportation, including jobs-housing issues. Also please see proposed General Plan Update policies addressing these regional issues, including Land Use Element Policy LG9 (Regional Planning, *previously numbered LG14*) and Implementation Action LG9.1 (Regional Land Use/Transportation Plan), Circulation Element Policy C2 (Regional Transportation and Commuter Transit, *previously numbered C6*), Housing Element Policies H22 (Work to Solve Regional Jobs/Housing Imbalance), H23 (Sustainable Regional Housing Solutions), and H24 (Cooperation on Legislative Changes), Economic and Fiscal Health Policies EF21 (Regional Economic Strategy) and EF23 (Jobs within the Region for Local Residents).

PC-16 (Plan SB GPU): Thank you for your comments. Please refer to responses letter I2.

PC Public Comments # PC (Continued)

PC-17 (Plan SB GPU and EIR): Thank you for your comments. The proposed General Plan incorporates Intelligent Transportation Systems (ITS) such as synchronized traffic lights (please see proposed Circulation Element Policy C1.5 (Optimize Capacity, *previously numbered C5*). Please also refer to responses I9-5, I9-6, and I9-48 (under Draft General Plan Update) and I9-2 and I9-3 (under Draft EIR).

PC-18 (Plan SB GPU): Thank you for your comments. Please refer to response letter I-13.

PC-19 (Plan SB GPU and EIR): Thank you for your comment. EIR Section 17.7.2, Energy and Climate Change, includes detailed evaluation of energy use and sustainability with regard to supplemental water supply.

PC-20 (Plan SB GPU): Thank you for your comment. Please refer to response IEP1-1.

PC-21 (Plan SB GPU): Thank you for your comment. Please refer to response IEP7-1.

PC-22 (Plan SB GPU): Thank you for your comment. Please refer to response I26-1.

PC-23 (Plan SB GPU): Thank you for your comments. Please refer to response I31-1.

PC-24 (Plan SB GPU): Thank you for your comments. Please see responses O23-1 through O23-6.

PC-25 (Plan SB GPU): Thank you for your comments. Please see response O22-4.

PC-26 (Plan SB GPU): Thank you for your comments. Please see response O16-1, O16-2, O16-3, O17-1, O17-3, and O17-4.

PC-27 (Plan SB GPU): Thank you for your comments. The City appreciates your feedback and input.

PC-28 (Plan SB GPU): Thank you for your comments. Please refer to responses O23-1 through O23-6.

PC-29 (Plan SB GPU): Thank you for your comments. Regarding the amount of residential development, , unlike the non-residential growth cap policy, the proposed General Plan does not include a policy cap on the number of residential units, other than the general policy that new development is to be supported by adequate resources. Historically, the City has not limited or paced residential development, although the rate has been relatively stable in past decades. Because there is no specific project description policy, estimates for residential build-out to the year 2030 were identified as analytic assumptions for each alternative studied based on the associated policy sets, for the purpose of evaluating environmental impacts.

PC-30 (Plan SB GPU): Thank you for your comments. The City appreciates your feedback and input. Please refer to responses A2-1 and A2-6 regarding historic buffers.

PC-31 (Plan SB GPU): Thank you for your comments. The City appreciates your feedback and input. Please also refer to responses O9-2 and O9-4.

PC-32 (Plan SB GPU): Thank you for your comments. **PC-33 (Plan SB GPU):** Thank you for your comments.

CITY COMMISSION AND COMMITTEE COMMENTS

C1, Planning Commissioners (Hearings of April 28-29 & May 6, 2010)

Response to City Commission Comments Letter # C1, Planning Commissioners (Hearings of April 28-29 & May 6, 2010)

Thank you for your comments.

Transportation

C1-1 (Jordan): Comments are noted. Regarding commuters, please see revised text in EIR Transportation Section 16.1.1 (Transportation Modes). With regard to the effects of housing Downtown and of Transportation Demand Management (TDM) on existing commuters, the EIR traffic analysis does not assume that all Downtown housing will be developed for the workforce, and does not assume that affordable housing is taking people off the highway – housing located Downtown is expected to have beneficial trip reduction effects, but cannot be quantified. The model assumes that travel behavior of occupants of new Downtown units will be similar to that of existing units in the area, and result in lower average per unit new vehicle trips. Further, the most significant trip reduction benefits of a vigorous TDM program would be reductions in trips of existing commuters, as the number of existing commute trips far outweigh the traffic increase of new development projected under *Plan Santa Barbara*. However, none of the scenarios indicate that the City would be able to reverse the trend of employees moving for affordable housing reasons.

C1-2 (Jacobs): Comments are noted. MTD currently offers both regional express and local bus service with frequent regional peak hour express bus service connecting South Coast destinations such UCSB and Carpinteria; MTD service costs approximately \$100/hour or \$500,000/bus and is funded by fare box revenues, State and Federal funds, and Measure A which together comprise the MTD annual budget of approximately \$21 million dollars. There are also some federal and State one-time funds, such as stimulus funds and CMAC grants.

In addition to South Coast-wide service, SBCAG manages regional bus service from between North County communities such as Lompoc, Santa Maria, and Buellton and the South Coast, as well as between Ventura and the South Coast (in cooperation with Ventura County Transit Commission). However, a robust regional transit system is not yet fully in effect, particularly with regard to rail service.

C1-3 (Jostes): Comments are noted. The Santa Barbara Metropolitan Transit District (MTD) and Ventura County Transit Commission (VCTC) coordinate on providing regional transit.

C1-4 (Larson): Comments noted. The goal of proposed TDM program would not be to take cars away from people, but to improve the attractiveness and utility of alternative modes of transportation to manage congestion. Parking revenues could potentially be used to help fund transit operation, but such a decision would need to go through all appropriate City committees and involve all stakeholders such as the Downtown Organization, COAST, etc. Please refer to EIR Section 16.1.1 (Transportation Modes) discussion of commuter estimates.

C1-5 (Lodge): Comments are noted. Please see revised text on in EIR Section 16.1.1 (Transportation Modes) regarding commuters. The EIR did not quantify or forecast the precise number of commuters that could be affected by the Additional Housing Alternative. However, the EIR Section 19.6.3 (Population and Jobs/Housing Balance, Additional Housing Alternative) discussion and Table 19.12 describe the Additional Housing Alternative's beneficial effect on the City's jobs/housing balance. Please see also response C1-2 above.

C1, Planning Commissioners (Continued)

The more robust TDM program could be applied with any of the alternative growth scenarios to manage traffic; it would be expected to be more effective when paired with policies to increase affordable housing Downtown and improve infrastructure for alternative modes. The EIR analysis did not apply the robust TDM to the Lower Growth Alternative, because its policy set included a policy to maintain or increase parking requirements, which would conflict with the approach of the robust TDM. This scenario allowed the EIR to evaluate whether traffic could be managed through policies for lower growth alone, with the conclusion that it could not.

Expansion of the City parking pricing program contemplates adding on-street parking pricing, however it could also be applied in garages. Please refer to response C1-2 above regarding transit costs.

C1-6 (Schwartz): Comments are noted. Managing future congestion may involve trade-offs between various programs and approaches. Free on-street parking has a cost associated with contributing to Downtown congestion. The City, interested organizations, and the community will need to consider the appropriate balance between growth, congestion, limited available road improvements (and associated costs and impacts), and TDM programs such as priced parking. Some communities address concerns over the effects of parking pricing by offering the first 60 minutes free (Pasadena and Santa Monica) which can help change employee behavior and save the free spaces for shoppers, while others such as San Luis Obispo don't charge for evening parking or on Sundays or holidays.

C1-7 (Bartlett): Comments are noted. The land use assumptions that were utilized in the traffic model analysis assumed the distribution of growth based on available sites, zoning, historic trends, and City staff's experience. The assumptions were not so fine-grained as to account for unit size reductions, and the traffic model was designed to account for unit type (single- vs. multiple-family) and location (e.g., Downtown vs. outlying areas). Although the largest effect of the TDM Program on reducing congestion is from existing commuters, TDM does work in concert with land use and should be considered jointly.

Growth Areas and MODA Principles

C1-8 (Lodge): Comments are noted. The traffic model indicated that decreasing densities outside the MODA did not result in any appreciable traffic congestion relief. The MODA as a defined area has been eliminated from the project, and is represented by the MODA principles (GPU Policy LG4). Also please refer to the EIR Transportation chapter discussion of different trip generation rates for the four areas of the City (EIR Section 16.3.3 (*Plan Santa Barbara* Traffic Model)).

(Jordan): Comments are noted. The Downtown grid system has capacity to handle additional growth. Systems undergo upgrades as needed, and it is less expensive to do so in a concentrated area versus a large area. Also please refer to EIR Sections 14 (Public Services) and 15 (Public Utilities) for evaluation of the adequacy of infrastructure and services. Per existing and ongoing City processes, parks and recreation services and capital improvement projects would be planned and implemented as needed. Also see Draft GPU Economic and Fiscal Health Element Policies EF9 (Infrastructure Improvements) and EF25 (Development Impact Fees).

(Jostes): Comments are noted. Contracting the MODA to more tightly focus on the City's core (identified as Areas 1 and 2 in Figures 16.4 in the DEIR) would have the benefit of focusing development on the areas with the lowest trip generation rates within the City. For example, a new multiple-family housing unit in Area 1 (i.e., downtown) with one car, would generate approximately 0.42 peak-hour trips and 4.2 average daily trips (ADT) as opposed to .062 peak-hour trips and 6.2 ADT in more outlying areas of the City, such as Areas 3

C1, Planning Commissioners (Continued)

and 4. In addition, the EIR provides information on the effects of different MODA boundaries between *Plan Santa Barbara* and the Additional Housing Alternative, which assumed reduced MODA coverage. Please refer to EIR Appendices (I-3, *Travel Demand Model Overview, Table 5* and I-6, *Plan Santa Barbara Trip Reduction Impacts Analysis*).

The revised MODA policies reflect the four basic policy layers, including sustainability Principles, Policy Drivers, General Plan Elements/Policies, and the MODA/implementation, but also account for economic development emphasis. The success of these measures would be subject to a monitoring loop with the Adaptive Management Plan.

Density, Affordable Housing, and Design Policies

C1-9 (Jostes) (Plan SB GPU): Comments are noted. A separate follow-up economic performance study has not been done on the revised average density now proposed, however the initial economic study, work sessions with the Planning Commission, and discussions with local developers were used in identifying the current proposal.

C1-10 (Jacobs) (Plan SB GPU): Comments are noted. Please refer to GPU policy updates pertaining to historic resources protection, adaptive re-use, and rental incentives, including LG14 (Historic Structures), HR 1 (Adaptive Re-use), HR5 (Historic Resources Protection), and H13 (Rental Housing). The Regional Housing Needs Allocation (RHNA) number analysis is required by the Housing Element by State Law and, is therefore, incorporated into the Housing Element and EIR analysis. The reference to the RHNA number will be removed from the Land Use Element because it is a 20-year plan.

C1-11 (Bartlett) (Plan SB GPU): Comments are noted. The GPU policies do envision smaller building envelopes to address compatibility and community character, but with greater densities through smaller units. Additional densities would also be allowed for Community Benefit projects such as rental, workforce, and employer-sponsored housing.

C1-12 (Lodge) (Plan SB GPU): Comments are noted.

C1-13 (Larson) (Plan SB GPU): Comments are noted. Please see Policy HR5 regarding interim protection of historic resources that would be in place until the time that the Historic Resources Element is developed.

C1-14 (Jordan) (Plan SB GPU): Comments are noted. No changes to City height limits are proposed. Proposed policy changes would require special findings for a fourth story. The Plan emphasis is on promoting housing that is affordable to the local workforce, particularly rental and employer-sponsored housing. It can be expected that a portion of the workforce would choose to avail themselves of affordable units and avoid commuting.

C1-15 (Lodge) (Plan SB GPU): Comments are noted. Price-restricted housing restricts who can buy it based on income levels, but otherwise people are not restricted from purchasing property. For employer-sponsored housing, funding mechanisms may be added to tie housing use to employment.

C1-16 (Bartlett) (Plan SB GPU): Comments are noted. When Redevelopment Agency affordable housing funding sunsets, affordable housing projects will need to rely on other sources of grant funding for subsidization or local regulations that encourage or require affordable housing. GPU Housing Element Policies H23 (Sustainable Regional Housing Solutions) and H24 (Cooperation on Legislative Changes) propose actions to identify replacement funding.

C1, Planning Commissioners (Continued)

Form Base Codes will take time to implement. In the meanwhile, the primary housing strategy is to encourage higher density rental projects subject to the Design Review Process and general design direction in the updated GPU policies.

Land Use Map and Zoning Issues

C1-17 (Jordan) (Plan SB GPU): The base zoning applies and the City also requires a Conditional Use Permit for quasi-public uses, such as educational institutions, churches, and day care centers. Many CUP uses pre-date the permit requirement, so churches and schools were permitted at one time. GPU policies such as LG16 (Low Density Single Family Zoned Areas) and LG17 (Sustainable Neighborhood Plans), as well as EIR Recommended Measure RM Noise-1 (Neighborhood Noise) contemplate additional measures to address neighborhood land use compatibility issues.

(Jacobs) (Plan SB GPU): Comments are noted. The allowed uses need to comply with the base zoning or permitted Conditional Use Permit (CUP) for the site. Typically, any intensification of use is subject to review to determine if the use is in substantial conformance or if in compliance with the parameters of the CUP. However, some institutional uses are “non-conforming” and were never issued a CUP. A new policy has been added to the Land Use Element to review the permitting process for government public facilities and institutional uses, to strengthen findings when located in residential areas. Typically if a CUP was established, the Planning Commission resolution that defines the CUP can be found in the Planning Files. Please see Land Use Map for revisions.

(Lodge) (Plan SB GPU): Comments are noted. The 130-acre Elings Park South property is owned and operated in its entirety by the Elings Park Foundation. Annexation of the Elings Park South property to the City was approved by the Local Agency Formation Commission (LAFCO) in April 2008. The City designated the Elings Park South Open Space and Community Park, and zoned the property PR, Park and Recreation (Undeveloped Parkland Category). The current General Plan designation shows the northern portion of Elings Park as Recreation and Open Space, Proposed City Park (Community Park), with an underlying zoning designation of A-1, One-Family Residence Zone. Therefore, both north and south portions of Elings Park currently have the Open Space, Community Parks General Plan land use designations.

C1-18 (Schwartz) (Plan SB GPU): Comments are noted. The Covenant Restricting Use for Elings Park (Las Positas Park Expansion) was made and entered into by the County of Santa Barbara and the Las Positas Park Foundation and pertains to 130.650 acres of land. The City of Santa Barbara is not a party to the Covenant. By the Covenant, the Foundation agreed that the uses of the property would be confined and restricted for a period of 30 years beginning January 1, 1999. In summary, the Covenant restricted 120 acres to passive recreation and the preservation of wildlife habitat. Under the Covenant, this portion (commonly referred to as Elings South) would not be used for active recreation without prior approval by the County Board of Supervisors. The remaining 10 acres could continue in agriculture uses, or be converted to passive recreational uses or wildlife habitat. For purposes of the Covenant, passive recreation included activities such as hiking, trails, horseback riding, jogging, hand-gliding, operation of radio operated airplanes, picnic grounds, park benches, restroom, open public gathering meadow, a road, and no more than 60 parking spaces cumulatively. Passive recreation would not include activities such as ball fields, tennis courts, outdoor auditoriums, and other activities that alter the natural land.

C1, Planning Commissioners (Continued)

Changing the City's Community Park land use designation to a Regional Park designation would require a General Plan amendment and verification that any uses recommended for Elings Park South would be in compliance with the Covenant Restricting Use described above. The Draft GPU Land Use Element does not identify any proposed land use designation change for the Elings Park property.

Draft Environmental Impact Report Analysis

C1-19 (Larson): EIR Section 17 (Energy) recommends use of fuel cells to convert methane to energy at landfills such as Tajiguas; however, Las Positas is an unlikely site. The former dump site was closed per regulations and is not considered to constitute a hazard (refer to Figure 9.1 in EIR). The proposed Final EIR will be brought back to the Planning Commission for certification and will include a Response to Comments section along with any associated changes within the text of the EIR shown in underline/strike-out.

C1-20 (Jostes): Comments are noted. The DEIR analyses the cumulative effects over time of incremental projects citywide. All topics in the DEIR started as citywide *potentially* significant impacts. The EIR analysis found many to be Class 3 (less than significant) with existing regulations and proposed GPU policies, or Class 2 (less than significant with mitigation). Regarding Biology, the policy objectives may direct development to the core commercial areas, but there would still be some development potential in outer areas. For example, approximately 35% of all residential development or almost 1,000 units are forecast to occur outside of the core commercial mixed-use development areas. With limited remaining upland and riparian habitats, there is potential for gradual loss cumulatively, and measures are identified to further protect it. Similar analysis occurred with other impact topics. The DEIR public review period and Planning Commission and City Council consideration of the draft General Plan and EIR at multiple public hearings is the public vetting process for EIR identified mitigation.

With regard to the MODA and analysis within the EIR, the DEIR Project Description was the *Plan Santa Barbara Policy Preferences Report* initiated by City Council for environmental review. Since the time when the DEIR was under preparation, the MODA policy has been evolving to utilize the MODA principles rather than a specific mapped boundary, however this refinement would not change the EIR impact analysis.

With respect to individual projects proposed, the proposed General Plan Update policies are not in effect until adopted, however, the project-specific environmental analysis for the Cancer Center project determined that residential uses would be outside the highway setback identified in EIR Mitigation Measure AQ-1 (Highway 101 Setback) and the revised Draft GPU Policy ER7 (Highway 101 Setback, *previously numbered ER12 in the earlier GPU Draft*).

With regard to Community Character, this analysis was scoped into the DEIR as a component of Open Space/Visual assessment. This is not new but a standard issue as part of the Initial Study for individual projects, as well as this EIR. Please refer to EIR Section 13.3 (Open space and Visual Impact Evaluation Methodology) for discussion of impact significance guidelines. The programmatic analysis is qualitative in nature and identifies the potential cumulative citywide impact of gradual growth over two decades as less than significant, due to the extensive City design review process, existing guidelines, and stronger policy protections proposed in the General Plan Update. Also please refer to addition policy language identified as Recommended Measures to add detail to the General Plan policies to further protect sense of place and manage the built environment. In addition, please see responses O23-6 and I23-3.

C1, Planning Commissioners (Continued)

With regard to use of a worst-case scenario, the analysis employs a reasonable worst-case analysis of impacts as required under California Environmental Quality Act (CEQA) provisions. This means that a realistic (not unrealistic maximum) future growth scenario over the next two decades was utilized which considers historic build-out rates and draft policies proposed in the *Plan Santa Barbara* General Plan Update.

With regard to potential impacts to coastal dune habitats, as required by recent amendments to the State CEQA Guidelines, the DEIR identifies potential impacts on coastal dune habitat associated with potential future sea level rise and potential increased flooding of low-lying areas. Part of the low-lying area has sand dune habitat including presence of threatened species such as the Snowy Plover. Identified mitigation is considered to be feasible as part of a comprehensive shoreline management plan.

With regard mitigation measures, identified measures have been considered for general feasibility by staff and consultants and have defensible basis. Final determination of feasibility of mitigation measures and recommended measures, their support by substantial evidence, and their adoption is made by City Council. Only feasible mitigations have to be implemented. Mitigation Measures for Class 1 and 2 impacts are required to reduce potentially significant impacts. Recommended Measures for Class 3 (less than significant) impacts are not required to reduce identified significant impacts, but would be environmentally beneficial additions to the General Plan Update.

C1-21 (Schwartz): For purposes of this air quality issue, which involves involuntary exposure of lengthy duration, sensitive receptors are primarily identified as residential uses and schools, and potentially some types of medical facilities involving extensive stays.

C1-22 (Bartlett): Comments are noted. Growth and density assumptions were based on review of potential opportunity sites, historic development patterns, economic analysis, and the projected effect of existing and revised policies on development under each alternative development and policy scenario. Please refer to further discussions of EIR analytic assumptions in EIR Sections 3 (Project Description), 4 (EIR Growth and Policy Assumptions), and 5 (Description of Alternatives).

With regard to setbacks from U.S. Highway 101, the EIR discusses potential health effects of diesel particulates, the California Air Resources Board 500-ft general guideline, and the City-specific study that identified 250 feet as an interim guideline. Please also see response A9-2.

C1-23 (Jacobs): Comments are noted. The EIR concludes that both the Lower Growth and Additional Housing Alternatives are each environmentally superior for different issue areas. The Lower Growth Alternative tends to be superior for impacts related to local and site-based resources, constraints, or issues confined to the City, such as biology, geology, visual resources, public services, etc., while the Additional Housing Alternative tends to be environmentally superior for citywide or regional issues such as traffic, air quality, energy, and jobs/housing balance. City decision-makers will need to consider the information in EIR Section 22.3 (Environmentally Superior Alternative) to determine if there is a clear environmentally superior alternative or if aspects of each of these alternatives should be considered as environmentally superior. CEQA does not address socioeconomic issues unless they cause associated physical impacts; the EIR's focus is on impacts on the physical environment. Direct impacts are evaluated at the level commensurate with project specificity; secondary impacts at a lesser level.

C1, Planning Commissioners (Continued)

With respect to the EIR Summary discussion of the Alternatives analysis and the basis of conclusions, note that each EIR impact section includes a discussion of Alternatives in more detail, and also please refer to EIR Section 22 (Summary of Alternatives Analysis).

The State CEQA Guidelines (§15364) provide that “feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, legal, social, and technological factors. Identified Mitigation Measures and Recommended Measures for this programmatic plan were considered by document preparers to be feasible, given the two-decade horizon for plan implementation and occurrence of impacts. However, decision-makers make the final determination of feasibility. Decision-makers will have to consider substantial additional information beyond the EIR when considering approval action on the General Plan Update, including input from agencies, community organizations, citizens, City advisory boards, and staff; and other information not from the EIR, such as economic information.

A moderate expansion of TDM measures is proposed as part of the Draft *Plan Santa Barbara* General Plan Update Policies (see Circulation Element policies). The EIR traffic analysis identified stronger TDM measures as Mitigation Measure Trans2.c (Expand TDM Program) to address significant traffic effects.

C1-24 (Lodge): Comments are noted. The EIR does recognize that strengthening policies to further promote and provide incentives for workforce housing downtown could reduce pressure to provide for housing demand in outlying areas. Please see further discussion in EIR Section 4 (EIR Growth and Policy Assumptions) and individual impact discussions of the Additional Housing Alternative throughout the EIR.

Please refer to EIR Section 22.3.1 (Identification of Environmentally Superior Alternative/Introduction) for discussion of CEQA requirements in this regard.

Please refer to EIR discussions of the urban forest in Sections 7.4 (Biological Resources/Impact Bio-4: Urban Forest and Individual Specimen Trees), as well as discussions and references in Sections 6 (Air Quality), 13 (Open Space and Visual Resources), and 18 (Global Climate Change).

Regarding the local and regional jobs/housing balance, EIR Section 19 (Population and Jobs/Housing Balance) Table 19.12 portrays estimated population under each alternative based on the number of new housing units and average occupancy per household.

In regard to water resources, please refer to EIR Section 15.1.1 (Public Utilities/Water Supply) for a detailed discussion of water supply (see also Tables 15.2 and 15.3).

Food resources policies were added to the Draft Plan based on public comment.

Please see changes to EIR Section 13 (Public Services/Parks) Table 13.1 for addition of Skofield and Arroyo Honda parks.

C1-25 Additional Planning Commission Discussion (Plan SB GPU): Additional Planning Commissioner comments are noted including general comments regarding General Plan process issues, and discussion of Draft General Plan Sustainability Principles, City versus regional sustainability, General Plan growth limit policy options, and the key decision options matrix to identify a hybrid policy set. Please refer to the revised Draft General Plan Update document for policy refinements, and the proposed Final EIR Hybrid Alternative Analysis.

C2 Planning Commissioners (Hearing of June 3, 2010)

Response to City Commission Comments Letter # C2 Planning Commissioners (Hearing of June 3, 2010)

C2-1: Thank you for your comments.

Historic Resources

C2-1 (Jordan) (Plan SB GPU): Comments are noted. Please see refinements to draft policies in the Land Use Element (LG14.5) and Historic Resources (HR5) to further address buffering of historic resources, and establishment of historic districts.

C2-2 (Jacobs) (Plan SB GPU): Comments are noted. Please see response to comment C2-1. New policy language includes protection of El Presidio de Santa Barbara State Historic Park, and all properties owned by the State are proposed for designation as Park on the General Plan Land Use Map. Re: Guidelines implementation funding and timing; the adoption process will take time; however, the City has multiple mechanisms in place along with proposed new policies to address potential issues in the interim. Please refer also to EIR Section 23, Mitigation Monitoring and Reporting Plan and Table 22.1 which identifies development of form-based codes during 2011-2016.

C2-3 (Larson) (Plan SB GPU): Comments are noted. Please refer to proposed GPU Historic Resources Element policies (HR1 Adaptive Reuse, *previously numbered CH3*) and various Housing Element policies addressing adaptive management.

C2-4 (Schwartz) (Plan SB GPU): Comments are noted. Please see responses to comments C2-1 and C2-2.

C2-5 (Jostes) (Plan SB GPU): Comments are noted. Please see response to C2-1 and C2-2.

Transportation

C2-6 (Jordan) (Plan SB GPU): Comments are noted. Parking pricing provides an improved assurance to customers that parking will be available near their destination.

(Jacobs) (Plan SB GPU): Comments are noted. Traffic Analysis Areas depict different areas in the City where existing land uses display different trip generation characteristics, based on their mix of land uses, the road system, proximity to other land uses, transit availability, etc. EIR Figure 16.4 is discussed in EIR Section 16.3.3 (*Plan Santa Barbara* Traffic Model/Development of the Forecast Volumes), as well as in Appendix I.

(Lodge) (Plan SB GPU): Comments are noted. It is expected that an expanded parking pricing program would focus on adding on-street parking pricing, but adjustments to garage parking pricing could be considered as well.

(Jostes/Jordan) (Plan SB GPU): Comments are noted.

Residential Density/Affordable Housing/Housing Target Areas

C2-7 (Jordan) (Plan SB GPU): The affordable housing that is being targeted is workforce housing including higher densities for rental housing and employer sponsored housing. Proposed Policy LG5.1 (Affordable Housing) would require development of standards to encourage affordable community benefit housing. Residential density provisions and any additional density allowances for rental and workforce housing will be established prior to adoption of the General Plan. However, additional densities provisions can be further considered at the time that Form Based Codes and standards for market rate housing are developed at a later phase.

C2 Planning Commissioners (Continued)

C2-8 (Lodge) (Plan SB GPU): Comments are noted. The density allowed in Downtown is currently 15 to 27 dwelling units per acre. Land use density designations can affect land costs. Smaller affordable units could be expected to be attractive to a portion of the workforce. The City already has ample high-end units. The proposed density changes are being considered together with stronger design controls to ensure building size, bulk, and scale is compatible and protects community character.

C2-9 (Schwartz) (Plan SB GPU): Comments are noted. Price-restricted affordable housing units are price to be affordable to households with low and moderate incomes, defined by State Housing and Community Development to be those households with incomes of less than or equal to 120 percent of the area median income. The City recognizes the need for affordable housing for household income groups earning up to 200 percent of the area median income, which include middle and upper-middle income households, sometimes referred to as “work force” housing. To date, provisions that restrict affordability have only been applied to subsidized Housing Authority housing, not market housing. Density bonuses would continue to be applied in addition to base density.

C2-10 (Bartlett) (Plan SB GPU): Comments are noted. Please see response C2-7 regarding the type of affordable units the draft GPU policies are targeting. The average residential density table has been expanded to allow for higher densities the smaller the units. The GPU policies do envision smaller building envelopes to address compatibility and community character, but with greater densities through smaller units, and potential higher densities for community benefit residential projects.

(Jacobs) (Plan SB GPU): Comment is noted.

C2-11 (Larson/Jostes) (Plan SB GPU): Comments are noted. The City Transfer of Existing Development Rights (TEDR) program applies only to existing developed non-residential property or approved projects. Some communities have programs allowing transfer of *development potential* or “air space.” The City has not historically included transfer of air space rights, and there is no proposal to do so.

C2-12 (Lodge/Larson/Jorden/Jostes) (Plan SB GPU): Comments are noted.

C2-13 (Larson) (Plan SB GPU): Comments on the DEIR and Draft GPU received during the 60-day public comment period are responded to in the proposed FEIR with associated revisions to text and policies in the documents.

(Jostes) Comments are noted. Decision-maker findings will be required for certification of the EIR and adoption of the General Plan.

C2-14 (Jostes/Schwartz) (Plan SB GPU): Comments are noted. The action by the Planning Commission was forwarded to City Council.

C3, Parks and Recreation Commission (April 28, 2010)

Response to City Comments Letter # C3, Parks and Recreation Commission (April 28, 2010)

C3-1 (Plan SB GPU): Thank you for your comments. Your input is appreciated and your comments have been forwarded to decision makers.

C3-2 (Plan SB GPU and DEIR): Comments noted. More specifically identifying park needs will certainly be a part of implementing Policy OP.1 (Park and Open Space Standards and Planning), as well as part of the future update to the Open Space, Parks, Recreations, and Trails Element. As Sustainable Neighborhood Planning occurs in individual neighborhood areas of the City (Policy LG17), neighborhood-serving park and recreational services can also be addressed.

EIR Section 14.1.3 (Public Services Setting/Parks and Recreation) notes “that park and recreational service are sufficient overall, but not optimal in all park categories or locations...” Please also note the discussion in EIR Section 14.4 (Citywide Impacts to Public Services/Impact Serv-3: Parks and Recreation Services): “Future demand could also increase for specific recreational facilities such as sports facilities or ball fields that are currently near capacity.” EIR Table 14.6 (Impacts of Alternatives on Demand for Park Land) also identifies increased demand for seven different types of park facilities and identifies specific acreages of needed park land, including 17.55 acres of neighborhood parks.

C3-3 (Plan SB GPU): Comments noted.

C3-4 (Plan SB GPU): Comments noted. Also, please see edits to Land Use Element Policy LG10.1 (Multi-generational Facilities and Services) and Housing Element implementation action H6.3 (Upgrade Facilities for Seniors) to emphasize support for land uses and services for seniors with long-term care needs. Staff agrees that absence of preparation of a neighborhood plan would not preclude development of individual components such as a park.

C4, Water Commission (May 10, 2010)

Response to City Comments Letter # C4, Water Commission (May 10, 2010)

C4-1: Thank you for your comments. Please refer to February 10, 2010 memo to City Council from Rebecca Bjork and John Ledbetter detailing the numerous opportunities and instances of coordination and formal participation in the General Plan process by the Water Commission over the past several years.

C4-2: Comments noted. Please see discussion below:

Map: The proposed General Plan Land Use Map has been edited to label and represent all institutional facilities as one light blue color. Please see revised map.

Alternatives: Comment noted. The Lower Growth Alternative was specifically crafted to address the listed issues; the other alternatives were not.

Public Controversy: Comment noted.

Biological Resources: Comment noted. The title and discussion refer to “additional water quality and creek protection and restoration standards...”

Hazards: Comment noted. Agricultural water rates are not discussed in the EIR Summary or EIR Section 11 (Hydrology and Water Quality).

Hydrology: Comment noted. Water quality/pollution concerns are addressed in this EIR section, but are also applicable to biological resources. Water issues overlap with a number of other environmental issues. This issue is not specifically related to water supply. Please note use of “groundwater” spelling in revised text.

Public Utilities: Comment noted.

MM BIO-2: Comment noted. Such impacts would most likely be beneficial; however, there is some debate whether increased recharge associated with removal of concrete lining would be a net benefit to groundwater supplies or whether benefits would be negated by increased discharge from the shallow (and possibly deep) groundwater.

RM HAZ-3 Wildland Fires: Comment noted.

RM HYDRO-2: Comment noted. The City owns and manages El Estero Wastewater Treatment Plant.

RM PU-1 Future Water Supply and Demand Protection: Comment noted. Please see revision.

C4-3: Comment noted. The Water supply section of the EIR was prepared by AMEC in consultation with the City Community Development Department and Public Works Department Water Resources Division. The analysis is based upon existing City documents such as the Long Term Water Supply Program (LTWSP) and the Urban Water Management Plan Update, State documents such as the State Water Project Delivery Reliability Report and the Water Supply Planning Study prepared by Carollo Engineers for the City. The recent City water supply consultant studies have been provided to and discussed at the Water Commission, and are expected to also be referenced in detail during the upcoming LTWSP update. Based on these and other studies, the EIR sets forth a detailed projection of long-term water supply and demand. Because substantial newer information on both supply and demand are available, these projections differ from those in the adopted LTWSP; however, the basic water supply planning policy framework from the adopted LTWSP remains the policy principle guiding this analysis.

C4, Water Commission (Continued)

Upon certification, the City will deem this analysis adequate and complete for purposes of environmental review requirements of the General Plan update, including the EIR's assessment of the adequacy of long-term water supplies. The City will be bound by this information to the extent it is reflected in adopted General Plan policy. It would be anticipated that the following planning work to update the LTWSP would provide additional detailed analysis and policy refinement for water supply management beyond the General Plan EIR analysis and broad General Plan policies. To the extent the updated LTWSP digresses from the analysis provided in the EIR, additional environmental review could be required if new potentially significant environmental impacts could be associated with any such changes. However, based on the findings of any future required environmental review, the City Council retains broad discretion to amend or alter different approaches, plans, and policies within a new LTWSP.

C4-4: Comment noted. Please see the responses outlined for each water supply source below. As noted above, analysis of projected available water supplies is based upon the general policy direction approved by the Water Commission and City Council in the adopted LTWSP, but accounts for the best information available from new sources of information published since publication of the 1994 LTWSP.

Lake Cachuma: Comments noted. Please refer to recommended measure RM PU-1(3), which identifies the need to assess sediment removal/management at Lake Cachuma and Gibraltar Reservoir

Gibraltar Reservoir: Comment noted. While it is appropriate to be conservative in an EIR, the projected yield from Gibraltar Reservoir of 3,612 acre-feet per year (AFY) is already a conservative estimate, as described in EIR Section 15.1.1 (Water Supply Sources/Gibraltar Reservoir). The figure of 3,206 AFY from Table 15.3 is projected yield during the first year of a drought. Basing long-term average year yields of a key water supply source on drought year yields is inappropriately conservative as it effectively adds yet another buffer onto the City's already cautious 10% drought buffer. Prudent management of available supplies is balanced with planning for water availability during critical droughts. Unnecessarily constraining typical available supplies based on drought year yields would constitute a policy shift from the existing City Council approved LTWSP, which uses the 10% drought buffer to account for variations in yields. Such a shift in policy also goes beyond CEQA requirements to employ a reasonable worst case analysis.

Please refer to mitigation measure RM PU-1(j) which identifies the need to study and possibly pursue sediment removal/management through from Lake Cachuma and Gibraltar Reservoir.

State Water Project (SWP): Comment noted. Please see EIR Section 15.1.1 (Water Supply Sources/State Water Project) for expanded discussion of the Water Supply Planning Study analysis of SWP reliability. The distinction between assumed SWP deliveries during normal and drought years is important in identifying reasonable, conservative assumptions. Carollo Engineers and the principle author of the SWP chapter of the Water Supply Planning Study have confirmed that estimates of deliveries during two-year droughts are appropriate for a critical drought period, but not for typical/non-drought years. DWR's latest draft SWP Delivery Reliability Report projects median deliveries of 63 to 65 percent of Table A amounts. To reflect recent experience, the EIR analysis assumes typical deliveries would be 50 percent during typical non-drought years. DWR's draft report projects 32 to 36 percent average annual deliveries during a six-year drought, and Carollo Engineers recommends using a range of 26 to 34 percent. The EIR estimate assumes an annual average of 22 percent during multi-year droughts. Regarding potential improvements to SWP reliability from various Delta fixes, the EIR projections do not assume any of these will be in place during the 20-year planning period.

C4, Water Commission (Continued)

Groundwater: Comment noted. The figure of 1,300 AFY represents the City's portion of the safe yield of Storage Unit #1 and the Foothill groundwater basin of 1,800 AFY. The projected figures of long-term groundwater yields reflect improved City management of its groundwater resources through conjunctive use and creation of a more sustainable well field positioned to maximize groundwater yields while minimizing potential for seawater intrusion. Basing estimated long-term groundwater supplies on historic pumping ignores these changes in management practices and the accepted approach of using groundwater basin safe yields as an appropriately conservative approach for water planning. However, seawater intrusion is an additional factor in Storage Unit #1, and plans to pump safe yield on a prolonged basis need to be tested by USGS modeling, consistent with Recommended Measure PU-1.6 (Future Water Supply and Demand Protection/Groundwater Management Analysis).

Recycled Water: Comments noted. Please see text revisions. The LTWSP treats recycled water as part of the City's long-term water supply. Recycled water demand is identified as 800 AFY because this is the connected customer demand on the recycled water system. Similarly, potable demand is identified as 13,200 AFY from potable connections. As noted in the comment, it is important to recognize that this presently is met in part with potable water used for blending, which is described in the EIR Section 15.1.1 (Water Supply Sources/Recycled Water). It appears unnecessarily complex and confusing for report reviewers to separate out this water source. Rather, as with other water supply sources, the EIR characterizes the issues facing this supply source, but accounts for it within the City's total water supply. The Water Commission may want to recommend a different policy approach to the City Council as part of the next update of the LTWSP.

Desalinization: Comments noted. A correction has been made in EIR Section 15.1.1 (Water Supply Sources/Desalination) to note that the reactivation of the facility is not currently funded, but is within the capability of the City to fund. Regarding costs and rate impacts of reactivation, the EIR contains updated information on costs and rate impacts based on capital cost of \$17.7 million to reflect that the required distribution system improvements are now planned to move ahead in the near term, based on benefits to the overall operation of the system. The annual debt service cost is derived from a standard amortization calculation of a \$16.2 million financing with a 20-year term and 5% interest. The financed amount is based on \$17.7 million capital cost, less the available \$3 million desalinization reserves, plus 10% costs associated with bond issuance. A rate increase of 5% to cover the debt service component is calculated as the quotient of added debt service of \$1.3 million divided by projected revenues of \$28.5 million, including an assumed 10% demand reduction. Operating costs are calculated as 3,125 AFY times \$1,470/AF, or \$4.6 million per year, which is 16 percent of \$28.5 million.

As discussed in EIR section 15.1.1 (Water Supply and Service) and Table 15.1, the City has completed over \$120 million in improvements to its water supply system. Desalinization is a relatively expensive water source, however it is expected to be within the financial capability of the City to reactivate and utilize this supply source if required. The public, City Council, and Water Commission will have the opportunity to more fully consider this matter and related policy issues as part of the update of the LTWSP.

If reactivated in its current configuration, the Desalination Facility could have a capacity to produce 3,125 AFY. This level of production could both meet extended drought demand and, if determined appropriate by City decision-makers, provide a significant component of ongoing water supply without expansion of the facility. As noted in the EIR and discussed in the Water Commission comment letter, the City currently has adequate supplies from other sources to meet increased demand associated with projected growth under the proposed *Plan Santa Barbara* General Plan Update, even if the Desalination Facility is not expanded.

C4, Water Commission (Continued)

C4-5: Comments noted. Note that EIR Recommended Measure PU-1 (Future Water Supply and Demand Protection) suggests adding detail to the General Plan Public Services Element policies regarding assessment and coordination with other agencies on sediment removal from reservoirs.

C4-6: Comment noted. Please see response C4-4 above.

C4-7: Comments noted. Please see response C4-4 above. Consideration of alternatives to desalination, as well as other current water supply policies, is the specific intent of recommended measure RM PU-1 in EIR Section 15.9 (Recommended Measures).

C4-8: Comments noted. The policy contents of this section have been initiated by the Planning Commission and City Council as part of the public draft of Plan Santa Barbara. All policies will be subject to final review and approval by the City Council. Although discretion would remain to interpret these policies, after adoption, future changes to these policies would require an amendment to the City's General Plan. Please see also response C4-3 above.

C4-9: Comments noted. Please see detailed responses below.

Impact PU-1.1 (Future Water Supply and Demand/Increased Demand and Existing Water Supplies): The updated water demand figures were compiled based on actual 2006 and 2007 aggregate consumption data for City water customers. The City's former water demand factors were based on a 20-year-old study reflecting the state of water use efficiency in place at that earlier time. The updated water demand factors provide a basis for continuing demand management analysis as part of the LTWSP update and over the 20-year planning period. The Water Commission will be able to continue to review these demand projections in additional detail during the development and adoption of the updated LTWSP.

In regards to evaluation of supply and demand, please see response C4-4 above and the revised text in Section 15.1.1 of the EIR.

Discussion of five year critical drought supply and demand: Comments noted. Please see response C4-4 above.

C4-10: Comments noted. Please see responses C4-4 above and the revised text in Section 15.1 of the EIR.

C4-11: Comments noted, please see detailed responses below.

State Water Project: Please see response C4-4 above and the revised text in Section 15.1 of the EIR.

Desalination Plant: Comment noted. Please see response C4-4 above.

C4-12: Comments noted. Please see detailed responses below.

State Water Project Carryover; Groundwater Banking: Comments noted. These sources are included because water supply availability and planning has evolved considerably since adoption of the 1994 LTWSP. The comment regarding the need to investigate such approaches is consistent with the language of the draft GPU water supply policies and EIR water supply analysis and recommended policy additions. Please also see response C4-4.

Recycled Water Expansion: Comments incorporated. Please see revised text under Impact PU-1.2 (Reliability of Future Water Supply). The conceptual water quality improvement project is summarized in EIR Section 15.1.1 (Water Supply/Recycled Water). For further information, see page 4-59 of the Water Supply Planning Study (City of Santa Barbara, 2009b) or page 6 of the November 2009 Staff Summary: Water Supply Planning Study.

C4, Water Commission (Continued)

Long Term Water Supply Program Update: Comments noted. Please see draft Public Services and Safety Element policies PS4 through PS6 which address Water Supply and Wastewater. Please also see response C4-3 above.

C4-13: Comments noted. Please see response C4-4 and C4-9 above.

C4-14: Comments noted. Please see response C4-9 above.

C4-15: Comments noted. Please see draft General Plan policy PS6 (Citywide Public Utilities Impacts/Impact PU1.1-Increased Demand and Existing Supplies) and Implementation Action 6.1 (Gibraltar and Cachuma Reservoirs). The EIR's Recommended Measure PU-1 calls for consideration of these issues as part of the LTWSP update. As part of this process, the Water Commission would provide recommendations to staff and City Council to initiate the regional coordination necessary to protect and enhance these reservoirs.

C4-16: Comments incorporated. Please see revised text in Section 15.1.2 (Public Utilities Setting/Wastewater Treatment).

C4-17: Comments incorporated. Please see revised text in Sections 15.1.1 (Public Utilities Setting/Water Supply) and 15.4 (Citywide Public Utilities Impacts/Impact PU1.1-Increased Demand and Existing Supplies).

**# C5, Creeks Restoration and Water Quality Improvement Program Citizens
Advisory Committee (May 12, 2010)**

Response to City Comments Letter # C5, Creeks Restoration and Water Quality Improvement Program Citizens Advisory Committee (May 12, 2010)

C5-1: Thank you for your comments. The City appreciates the level of effort and feedback provided by the Citizens Advisory Committee on Plan Santa Barbara and the EIR.

C5-2 (Plan SB GPU): Comments noted. The Committee's qualified support of the Lower Growth and *Plan Santa Barbara* Alternatives will be forwarded on to decision-makers.

With regard to mitigation measure (MM) and policy wording, EIR identified mitigation measures required for potentially significant impacts are worded in the affirmative (i.e., "the City shall...."), while recommended measures (RM) use "should". Policies generally reflect this approach: where measures are considered essential to implement key goals identified by the City Council, stronger wording equivalent to "shall" is utilized, while desirable but non-essential measures are worded less strongly. In addition, General Plan level policies are typically broad and strive to both provide direction and also remain appropriately applicable to a variety of site-specific circumstances that may require a measure of design flexibility. Specific Committee recommendations on individual mitigation measures or policies are responded to in detail below.

In regard to the proposed policies and timing of implementation for mitigation measures, the draft General Plan and EIR contain an array of measures that address water quality and creek protection, many with a particular emphasis or goal that cannot be closely linked to a two- or five- year horizon, or even pending development. For example, MM BIO-2b sets forth ambitious goals for restoring 20 acres and one linear mile of riparian habitat. This measure will take substantial planning effort and funding and, although it may be achieved sooner, is projected to occur incrementally over the 20-year life of the new General Plan, as development and associated impacts is also projected to occur incrementally. In addition, MM BIO-2 requires existing concrete lining to be removed from creeks wherever possible, and that previously underground creeks be "daylighted." Although portions of this measure may be implemented by individual development projects, broad progress on this measure will require planning, time, and substantial funding.

Please refer to Table 23.1 of the EIR Mitigation Monitoring and Reporting Program, which sets forth initial recommended timing for many of these programs. In general, where mitigation measures or policies are required to avoid significant project-level effects or achieve a key City policy goal, they are identified for implementation prior to, concurrent with, or within a set time frame after project implementation. For example, fencing and erosion control measures to protect habitat must be in place prior to construction, while habitat restoration may take place over a 1-3 year period following initial construction.

The Committee's support for active implementation of mitigation measures is also noted. Please see revisions to MMRP Table 22.1 which identifies Committee involvement in planning for and reviewing relevant mitigation measure implementation.

C5-3 (Plan SB GPU): Comments incorporated in appropriate EIR mitigation measures and proposed General Plan policies. See revised policy text in Open Space, Parks, Recreation and Trails Policies, and EIR Section 13.8, Mitigation Measure VIS-1 (Open Space Protection and Restoration).

C5-4 (Plan SB GPU): Comments noted and partially incorporated; please see revised text. The City will make every effort to move forward expeditiously with a Comprehensive Climate Change Action Plan. Please refer to EIR Section 23 (Mitigation Monitoring and Reporting Program-MMRP) and draft General Plan implementation schedule

C5, Creeks Restoration and Water Quality Improvement Program Citizens Advisory Committee (Continued)

for proposed timelines. There are a number of complexities with regional coordination, funding, and staffing availability, and it is not likely to be possible to commit to a two-year timeline. City Council will determine implementation and funding priorities among all the General Plan implementation actions.

C5-5 (Plan SB GPU): Comments noted and partially incorporated; please see revised General Plan document text. The City will make every effort to move forward expeditiously with adoption of appropriate tree protection mechanisms, habitat mapping efforts, and adoption of a multi-use plan for the coast. It is not likely to be possible to commit to a two-year timeline. City Council will determine implementation and funding priorities among all the General Plan implementation actions. Please refer to EIR Table 23.1 (MMRP) which provides the proposed timing for these programs based on the EIR's findings, available City resources, and the severity and timing of potential impacts, and the draft General Plan implementation schedule.

Protective measures during nesting season are addressed by existing Federal and State resource agency provisions. Specific City control provisions for mechanized pruning during nesting season are detailed measures that could be more appropriately developed and addressed as part of a tree protection ordinance or guidelines, rather than at the General Plan policy level. Similarly, "minimizing or avoiding" high water use landscaping within oak drip lines could be more appropriate direction at the General Plan level than an outright prohibition. All other suggested changes have been incorporated.

C5-6 (Plan SB GPU): Comments noted and partially incorporated; please see revised General Plan document text. The City will make every effort to move forward expeditiously with adoption of a Comprehensive Creek Action Plan, Master Drainage Plan, driveway washing guidelines, and standards related to creek setbacks and development. It is not likely to be possible to commit to a two-year timeline. City Council will determine implementation and funding priorities among all the General Plan implementation actions. Please refer to EIR Table 23.1 (MMRP) which provides the projected timing for these types of programs based on the EIR's findings, available City resources and the severity and timing of potential impacts, and the draft General Plan implementation schedule. Other suggested changes have been incorporated into appropriate mitigation measures and policies.

C5-7 (Plan SB GPU): Comments noted and partially incorporated; please see revised General Plan document text. The City will make every effort to move forward expeditiously with adoption of vegetation and scenic view guidelines. It is not likely to be possible to commit to a two-year timeline. City Council will determine implementation and funding priorities among all the General Plan implementation actions. Please refer to EIR Table 23.1 which provides the projected timing for various programs based on the EIR's findings, available City resources, and the severity and timing of potential impacts, and the draft General Plan implementation schedule. Suggested map modifications have been included.

C6, Transportation and Circulation Committee (April 22, 2010)

Response to City Comments Letter # C6, Transportation and Circulation Committee (April 22, 2010)

C6-1: Thank you for your comments. Please refer to staff responses included within the Committee comments summary/meeting minutes.

The EIR discusses the synergistic effects of adequate or improved alternative transportation systems with parking pricing in Section 16.3.3, *Plan Santa Barbara* Traffic Model.

In regards to the ability to describe or quantify trip reductions for pedestrian, bicycle or transit use, please see added discussion in Section 16.3.3 (*Plan Santa Barbara* Traffic Model) regarding general reductions in trips from these modes of transportation.

In regards to the appropriate balance and interaction between the land use, Housing and Circulation Elements, the updated Land Use and Housing Elements recognize and implement many of the goals from the City's existing Circulation Element. The goals and policies of the Circulation Element have been both validated and refined by the new Traffic Model and quantified information on the effectiveness of various TDM measures. The balance between these three key elements will be considered together by City decision-makers during adoption of the General Plan Update as well as during upcoming implementation.

C6-2: Comments noted.

As discussed in Section 16.3.3 of the EIR, the relative transportation benefits of housing Downtown are not necessarily related to an assumption that future residents will both live and work Downtown, but due to the substantially lower average vehicle trip generation characteristics of Downtown housing as measured by empirical data provided by the Traffic Model (refer also to Appendix I). Because the Downtown has a mix of land uses, goods and services are close by, and infrastructure for alternative modes is in place, it is more likely that Downtown residents will choose to make a larger portion of their trips via non-auto modes than in other parts of the City.

In regards to TDM, both Sections 16.3.3 (*Plan Santa Barbara* Traffic Model) and Section 16.8 (Mitigation Measures) describe both "carrots and sticks" for TDM, including "car and van pool incentives", parking cash out (i.e., paying employees not to drive), subsidized transit passes, and permitting telecommuting and alternative work schedules.

C6-3: Comment noted. Both the EIR and draft General Plan Update recommend improved TDM. City decision-makers will consider and balance among sometimes competing quality of life issues in selecting the updated policy direction.

C6-4: Comment noted. EIR Section 16.3.3 (*Plan Santa Barbara* Traffic Model) and Appendix I set forth Transportation Demand Management (TDM) measures in substantial detail. As noted in the EIR discussion, other studies have identified passenger rail as effective. With regards to the effectiveness of TDM in reducing congestion, please refer to discussions in EIR Sections 16.3.3, 16.5 (Regional Impacts to Transportation), and 16.8 (Mitigation Measures), as well as Appendix I.

C6-5: Comment noted. Please refer to EIR Section 16.3.3 (*Plan Santa Barbara* Traffic Model) and Appendix I for detailed discussion of various TDM programs.

C6-6: Comment noted. It is important to note that Downtown housing has the lowest congestion-related impacts of any housing in the City (please see "blue box" discussion at the beginning of EIR Section 16.3).

C6, Transportation and Circulation Committee (Continued)

An expected advantage of parking pricing to customers and businesses is that customers could be more assured of the likelihood of finding a parking spot close to their destination. There are a number of communities that have instituted parking pricing programs to benefit economic vitality.

C6-7: Comments noted.

C6-8: Comments noted

C7, Downtown Parking Committee and Transportation and Circulation Committee (May 13, 2010)

Response to City Committee Comments Letter # C7, Downtown Parking Committee and Transportation and Circulation Committee (May 13, 2010)

C7-1: Thank you for your comments.

C7-2: Comments noted. Please refer to Meeting Minutes for staff responses to comments at the meeting.

In regards to transit, the EIR describes the importance of transit frequency and provides recommended mitigation measures that transit be increased along key transit routes.

The model separates commuters into three categories: those who both live and work within Santa Barbara (internal to internal commuters), those who live in Santa Barbara and commute to work locations outside Santa Barbara (internal to external commuters), and those who live outside Santa Barbara and commute to work locations inside Santa Barbara (external to internal commuters).

The model has been calibrated to account for congestion and reflect an increase in travel-time accordingly. For the portion of trips within the model area, the model can produce data related to free-flow and congested travel conditions, and can produce relative numbers between the two conditions. As such, it is currently possible to say that travel on corridor N during congested periods is X percent greater than travel on corridor N during uncongested periods. Similarly, it is possible to account for the percentage delay experienced by all commuters or subsets of commuters. Field data collection of travel times would be necessary in order to estimate the change in specific times along specific corridors.

In regards to moderate TDM, the components of such a program are described on pages 16-28 through 16-31 of the EIR (see also Table 16.5 and Appendix I).

In regards to on-street parking utilization, overall, Downtown on-street parking is not 100% utilized, however many desirable high demand areas receive full utilization, while some outlying are not fully occupied. The propensity of a given commuter to travel great distances in search of free parking is influenced by a number of factors. These factors include the extent to which the commuter values their time (which tends to rise with an increase in income), the extent to which the distant parking is still time competitive with other available options (including transit, rideshare, walking, or biking), and the extent to which the search for available free parking impacts the reliability of their travel time (i.e. the search for free parking may take 3 minutes or it may take 15 minutes, and the resulting walk time from that parking can vary dramatically).

Plan SB includes numerous provisions to address these factors by enhancing and promoting transit, ride-sharing, walking, and biking, all of which diminish the appeal of distant parking and hiking. Further, placing time limits on neighborhood streets for non-residents (residential parking permits) can nearly eliminate this option for commuters.

C7-3: Comments noted. There is no ideal time to perform a comprehensive parking survey as variables such as the seasons, special events, and festivals can all affect occupancy and turn-over. The consultant selected Friday and Saturday as the most representative of peak-demand on parking resources. The parking survey provides clear conclusion that certain areas of the City consistency receive high demand while other more outlying areas can be underutilized. The parking study confirmed that employee movement of vehicles (e.g., 90-minute shuffle) was a factor in both on-street and in-garage parking. For the purposes of the EIR, the parking study provides useful background information on the relationship of parking availability and traffic congestion. Further studies may be able to share more light on the breakdown of employees, residents, and visitors to the downtown, as well as exploration of the effect of employee parking on both the Eastside and

C7, Downtown Parking Committee and Transportation and Circulation Committee (Continued)

Westside. However, more detailed surveys can be expensive and more intrusive on participants. In closing, the goals of this initial survey were to assess occupancy of on-street parking and the study met that goal.

C8, Transportation and Circulation Committee-Chair Bradley (May 13, 2010)

Response to City Comments Letter # C8, Transportation and Circulation Committee-Chair Bradley (May 13, 2010)

C8-1: Thank you for your comments. Your concerns and recommendations will be forwarded on to the City's decision makers and considered by Community Development and Public Works Department staff during their formulation of recommendations to the decision makers.

C9, Transportation and Circulation Committee-Member Coffman-Grey (May 13, 2010)

Response to City Comments Letter # C9, Transportation and Circulation Committee-Member Coffman-Grey (May 13, 2010)

C9-1 (Plan SB GPU): Thank you for your comments. Your concerns and recommendations will be forwarded on to the City's decision makers and considered by Community Development and Public Works Department staff during their formulation of recommendations to the decision makers.

C10, Planning Commissioner-Sheila Lodge (March 25, 2010)

Response to City Comments Letter # C10, Planning Commissioner-Sheila Lodge (March 25, 2010)

C10-1: Thank you for your comments. Please see refined commuter numbers incorporated into EIR text in Section 16.1.1 (Transportation Modes).

C11, Planning Commissioner-Sheila Lodge (April 8, 2010)

Response to City Comments Letter # C11, Planning Commissioner-Sheila Lodge (April 8, 2010)

C11-1 (Plan SB GPU and EIR): Thank you for your comments. The information has been reviewed and text changes reflecting your comments included in the EIR and General Plan documents as appropriate. Please see also response O3-9.

C12, Planning Commissioner-Sheila Lodge (May 4, 2010)

Response to City Comments Letter # C12, Planning Commissioner-Sheila Lodge (May 4, 2010)

C12-1 (Plan SB GPU): Thank you for your comments. Please see General Plan document text edits to the “Becoming Santa Barbara” section reflecting your comments.

C13, Planning Commissioner-Sheila Lodge (May 17, 2010)

Response to City Comments Letter # C13, Planning Commissioner-Sheila Lodge (May 17, 2010)

C13-1 (Plan SB GPU and EIR): Thank you for your comments. The draft *Plan Santa Barbara* policies propose to continue Santa Barbara's slow-growth policies by reducing the non-residential policy growth cap further compared to the cap used for the past two decades, as well as refining housing policies toward unit types more affordable to the workforce, and increasing design review tools for the protection of the City's visual and historic character.

The City Council-adopted goals for the *Plan Santa Barbara* General Plan Update process, including goals for providing affordable housing and ensuring a strong economy, are reflected in the draft Plan goals, objectives, and policies, and the EIR Project Objectives. These inform the EIR assumptions about the relationship of growth to the economy. Recent source materials such as the City's *Plan Santa Barbara* economic studies support the assumption that an increment of additional growth supports continuing economic vitality and diversity. A small amount of non-residential growth allows for adaptation and a measure of expansion for businesses, and provision of additional workforce and affordable housing helps to address business issues such as the ability to recruit and retain qualified workers, and potential benefits to businesses and the community from employees that do not have long workday commutes.

The EIR identifies potential environmental impacts associated with growth, as well as potential environmental benefits from more affordable and workforce housing. The EIR Alternatives reflect the range of community opinion about growth levels and policy changes, to provide a comparative evaluation of potential impact levels.

It is worth noting that while reported population growth has been modest over the last decade, the City has added over 1,000 housing units, and hundreds of thousands of square feet of new or upgraded non-residential development to the urban inventory, along with associated job growth.

C13-2: Comment noted. The EIR does recognize that strengthening policies to further promote and provide incentives for workforce housing downtown could reduce pressure to provide for housing demand in outlying areas. Property owners of outlying open lands would retain the right to approach the City to request development however.

C13-3: Comment noted. EIR Section 19.4.1 (Citywide Job Growth and Housing Availability) discusses "secondary" job growth based on population increase. The EIR notes that such job growth is difficult to quantify, is dependent on the type of housing constructed and the incomes of future residents, and is accounted for as a part of overall Citywide non-residential growth. A limited amount of additional housing is projected to be built over the 20-year planning period. The EIR concludes that with the type of housing being promoted under the draft General Plan policies, primarily modestly-sized multiple-family homes as opposed to a high proportion of large estates, such secondary employment growth would be limited, and existing services could likely accommodate much of the increased business. Although this is a complex matter, based on available studies and the nature of growth projected, the EIR concludes that such secondary growth impacts would not be substantial.

C13-4: Comment noted. The EIR notes that the City is by far the leading provider of affordable housing on the South Coast. Both the draft General Plan and EIR recommend improved regional coordination on provision of affordable housing.

C13, Planning Commissioner-Sheila Lodge (Continued)

C13-5: Comment noted. Please see clarifications in EIR Sections 19 (Population and Jobs/Housing Balance) and 20 (Socioeconomic Issues). The EIR does not assume that there is general overcrowding based on the relatively low average household size. Rather, the EIR describes that for lower income families and households, “doubling up” or overcrowding of larger households into smaller units, as well as potential illegal second units, remains an issue for some households unable to afford the high cost of area housing.

C14, Planning Commissioner-Sheila Lodge (May 4, 2010)

Response to City Comments Letter # C14, Planning Commissioner-Sheila Lodge (May 4, 2010)

C14-1: Thank you for your comments. Please see adjusted text in the EIR discussion of Environmental Setting/Background: City General Plan and Growth Management Tools in Section 2.5.3 (Variable Density).

C15, Planning Commissioner-Sheila Lodge (May 17, 2010)

Response to City Comments Letter # C15, Planning Commissioner-Sheila Lodge (May 17, 2010)

C15-1: Thank you for your comments. Please see response C10-1 regarding commuters.

C15-2: Comment noted. Please see text revision in EIR Section 2.4 (Existing Land Uses).

C15-3: Comments noted and fact-based revisions have been incorporated in the EIR text as described below. In general, opinion-based editorial rewording of EIR text has not been included.

Page 2-7 (2.5.4): Comments noted. Regarding Variable Density discussion, also please see response C14-1 and text revision.

Page 3-1 (3.1): Comment incorporated.

Page 3-2 (Top lines): The text is referring to the overall Measure E growth policy caps while the graph refers to actual remaining un-built square footage that has not been allocated.

Page 3-2 (3.2.2): Comment noted. These are the proposed project objectives as endorsed for environmental review by the City Council. Comments and recommended changes may be considered by the Planning Commission and City Council as part of the Plan approval process.

Page 6-28 (2nd pp, last line): Comment noted; please see text revision.

Page 8-1 (8.0): Comment incorporated.

Page 8-1 (8.1.1): See revised text “and slope downward to the Coastal plain”.

Page 8-7 (8.1.4): Comment incorporated.

Page 8-9 (1st pp): Hope Ranch is located within County unincorporated area that is part of the City Sphere of Influence. These areas include neighborhoods exposed to a variety of geologic hazards, especially bluff retreat and mudslides. Evaluation of potential impacts within the Sphere is included as part of the EIR scope of analysis, since the Sphere identifies areas that may eventually become part of the City, and to consider regional cumulative impacts of the project area together with surrounding areas.

Page 8-10 (1st line, 4th pp): Comment incorporated.

Page 8-11 (Next to last line of 2nd pp): Please see response to page 8-9 above.

Page 8-23 (3rd line): Please see response to page 8-9 above.

Page 10-5 (1st pp): Comment noted, please see revised text.

Page 10-5 (Last 3 lines): Comment noted, please see revised text.

Page 10-6: Comment noted. The website version of the EIR has been updated to include Figure 10.1.

Page 10-7 (1st pp): Comment incorporated.

Page 10-7 (3rd pp): Two comments incorporated.

Page 10-11 (2nd pp): Comment incorporated with “and north of Alta Vista, with Grand Avenue to the East”

Section 11: Comment noted. The section also addresses groundwater.

Page 12-14 (5th pp, 2nd line): Comment incorporated.

C15, Planning Commissioner-Sheila Lodge (Continued)

Page 13-7 (1st line, 5th pp): Comment incorporated.

Page 13-7 (Last pp): Comment noted. The City's Victorian structures are already discussed in the Section.

Page 13-7 (Last line, 5th pp): Comment noted. However, the Canary hotel does constitute a building with an upper story available for public views.

Page 13-19 (4th pp): Comment noted, please see revised text.

Page 14-18 (1st pp): Comment noted. Note also that the EIR identifies overall citywide impacts to Public Services and Facilities as less than significant.

Page 15-2 (1st sentence, 3rd pp): Comment noted; please see revised text.

Page 16-9 (Last sentence, 3rd pp): Comment noted; please see revised text.

Page 16-50 (Table 16.7): Comment incorporated.

Page 16-53 (1st line, 4th pp): The 403 units is correct and constitutes residential growth assumptions forecasted for the City Sphere of Influence, for purposes of the EIR impact analysis.

Page 19-5 (3rd and 4th pp) and 19-8 (last pp): Comments incorporated.

Table 22.1: Comments incorporated.

C16, Architectural Board of Review Member -Keith Rivera (April 28, 2010)

Response to City Comments Letter # C16, Architectural Board of Review Member - Keith Rivera (April 28, 2010)

C16-1: Thank you for your comments, which have been forwarded to decision-makers.

C17, Water Commissioner - Russell Ruiz (April 22, 2010)

Response to City Comments Letter # C17, Water Commissioner - Russell Ruiz (April 22, 2010)

C17-1: Thank you for your comments. Please see responses to comments provided in response C5.

ATTACHMENT TO INDIVIDUAL LETTER # I1-JOHN ACKERMAN